ESTTA Tracking number:

ESTTA462063 03/15/2012

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92046185
Party	Plaintiff Amanda Blackhorse, Marcus Briggs, Phillip Gover, Shquanebin Lone-Bentley, Jillian Pappan, and Courtney Tsotigh
Correspondence Address	JESSE WITTEN DRINKER BIDDLE AND REATH LLP 1500 K STREET NW, SUITE 1100 WASHINGTON, DC 20005-1209 UNITED STATES Jesse.Witten@dbr.com, John.Ferman@dbr.com, Lee.Roach@dbr.com, Stephen.Wallace@dbr.com
Submission	Other Motions/Papers
Filer's Name	Jesse A. Witten
Filer's e-mail	Jesse.Witten@dbr.com, dctrademarks@dbr.com, Jennifer.Criss@dbr.com
Signature	/Jesse A. Witten/
Date	03/15/2012
Attachments	Part 54 of 60 BLA-TTAB-06057 - 06163.pdf (109 pages)(7249904 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Registration No. 1,606,810 (REDSK Registered July 17, 1990,	INETTES)
Registration No. 1,085,092 (REDSKINS) Registered February 7, 1978,	
Registration No. 987,127 (THE REDSKII Registered June 25, 1974,	NS & DESIGN)
Registration No. 986,668 (WASHINGTO Registered June 18, 1974,	N REDSKINS & DESIGN)
Registration No. 978,824 (WASHINGTO Registered February 12, 1974,	N REDSKINS)
and Registration No. 836,122 (THE RED Registered September 26, 1967	SKINS—STYLIZED LETTERS)
Amanda Blackhorse, Marcus Briggs, Phillip Gover, Jillian Papan, and Courtney Tsotigh, Petitioners,))))
v.) Cancellation No. 92/046,185
Pro-Football, Inc.,)))
Registrant.))

ATTACHMENT TO PETITIONERS' FIRST NOTICE OF RELIANCE

PART 54 OF 60

BLA-TTAB-06057 – BLA-TTAB-06163

Respectfully Submitted,

/s/Jesse A. Witten

Jesse A. Witten
Jeffrey J. Lopez
John D. V. Ferman
Lee Roach
Stephen J. Wallace
DRINKER, BIDDLE & REATH, LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005

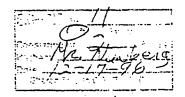
Washington, D.C. 20005 Telephone: (202) 842-8800

Fax: (202) 842-8465
Jesse.Witten@dbr.com
Jeffrey.Lopez@dbr.com
John.Ferman@dbr.com
Lee.Roach@dbr.com
Stephen.Wallace@dbr.com

Counsel for Petitioners

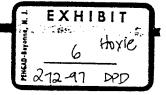
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THE ENGLISH LANGUAGE INSTITUTE OF AMERICA
Chicago

1975



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re-dece-a-rate, ré-deci-rate, ed., espaire re-decerate, re-deci-rate, re-deci-rate, espaire ri-than, a. re-de-i-cate, re-deci-rate, re-deci-rate, re-deci-rate, re-deci-rate, re-deci-rate, re-deci-rate spain-re-deci-rate, re-de-i-rational re-deci-rate spain-re-deci-rate, re-deci-rate re-deci-rate, re-deci-rate

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reican whiterail. Odocolous empresons, re-de-sign, rédi-tiai, s.t. To champing the summer cost.

den, red m, s.t. To make red,—s.t. To me red: to fluid or bluid.

dermined, redermang. To come age.

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ment, a verticepoir, a review of the management of the control of

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red Grans, s. Any of several trees of degrans. Escalypou, csp. E. consideration, and the crude: the reverse transfer in the first section of the crude: the reverse time or inquidants resultantian resultantian red-based-or, reducing the communication critics; self-incrementary, each seed, conductive self-incrementary, reducing the communication of the communi

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at the red oak group, a number of oak of the red oak group, a number of certain sension described sogether because of certain sension characteristics, e.g. their brittle-speak carea, a. A red, carthy mixture, consideration, and a characteristics, at [L. redslead, send as a coloring agent, and the redslead, or carea a scent, and the redslead redslead, and the redslead re

moley, the doubling of the double made by exponent.

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The proposition of the couple of the couble of the couple of the cou

"Metrice resemble the state of the state of

red pre-peer, a. One of many culcivated varieties of Capacians (massive, a proper plant having red pode, used as pruncest condiment; cavenee perpeer, a separate condiment; cavenee perpeer, red-peed, someth, with a bright red fore-head said black chial, breeding in substreme repons and watering in northern U.S. Red Fell, a. An English breed of reddish, housies dairy castle, often raised for beef. Also Red Pellod.
Also Red Pellod.
Also Red Pellod.
Article draward; osen, a draft on the distribution of the distribution of the bill plus the costs and charges.

The already of the redding to compensate; to adjust on put raptil. To remedy or put right, as a wondering; to compensate; to reduce, as sudering; to compensate; to adjust; to make repartition or amends to—reddres, in-dres', r. Relief from wrong, injury, or oppression; undoine of wrong; interpartion; indeminent, a.

undoing of wrong; reparation; indemiunification; correction, were dressed, redressed, a. A ribbon, uru, surroby
marked, given to the winner of the sconed
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as a rors for formerly used in dyring; layof the illinert, or plants with red root, as
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pigwood, American discovers, and a
pigwood, American of the dardpiper family, having red bills, leep, and feet,
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red shift, a. Asrace the physical effect
which causes light emated by a climat
planty or other recogning object to appear
redder the farther it moves away from
certta.

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L. American, popular as a cage bird,
red shift, a. A. A. A. A. A. A. American

Lacouson of the recogning object to appear
redder the farther it moves away from
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S. America, popular as a cage bird.

S. America, popular as a cage bird.

red easie, red 'sim', a A N. American
red easie, per, a A reddish, edible, sait
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islong the Florida coast and in the Gulf of
Mccoc.

red septi-der, a Any of various small mittes,
red septi-der, a Any of various small mittes,
red septill, a An onionible Europease plant,
Utyress earliers, steed in making rat
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red-seart, red staff, a A brighty colored
American warpler, Satephage mancille, the
male largely black with a Memorical patches or
wing and tail, and consonally appreciating rat
rail like a fan. A mall Europeas thrust.

Phoesicarse phemomen, with red on call ond
breast; also brea-red.

red cape, a Rigid or encounter positions and
procochures causing delay or inaction, as
a buressurner, red-tap-time, and concred-tape, a A reddish integ on on water
caused by aggrephions of tary marine
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red-tape, red-top, indde, s.t. reduced, reducop, [L. reduce-re, beth, and duce, to
faced, I to diminanh is use, quantity, or
value; to make less or lower, as in strength
or degree; to bring to an indrive condition;
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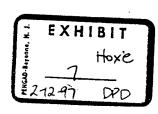
inhered at an entrement. Lear-durine and absorbitum, a. [L.] The crimina of a proposition by disclowure of the absorbing of the proposition by disclowure of the absorbing of the proposition of the absorbing of the proposition of the control of the absorbing of the control of

to true, delete, or otherwise correct; to dues someone to despose; to bring into orderly red-wing block-bird.

be let, fate, får, fåre, fåll; e- met, me, mere, her; i- pin, pine; e- not, note, move; u- tub, tube, bull; es- oul; eu- pound.

THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE

c 1969, 1970, 1971, 1973, 1975, 1976, 1970, 1980, 1981



NYPL EXPRESS

s stream of sir. b.

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NOTICE: red-tervier (réd'lét'or) aut. Memorably happy: a red-letter day.

[From the rubrication of feasts in church calendars.]

THIS MATERIAL MAY WElloht. A red traffic or danger rignal indicating stop.

PROTECTED BY COPY And light district (réd'lit'). A seighborhood containing many

V (TITLE 17, U.S. Card, mashbory. A tree. Memo

blackberrylike fruit.

red musics, British, Any fish of the family Mullidae; a goatfish, red-neok (red'nek') a. Siang. One of the white rural laboring class in the southern United States, Used disparagingly.

re-do (re'dob') tr.v. -did (-did'), -done (-dim'), -doing. (-dbz'). 1. To do over again. 2. To redecorate.

red ocher. 1. A natural red snixture of clay and iron oxide; an ocher (see). 2. A refined form of this mixture used as pigment. ed-o-less (réd's-bat) adt. 1. Having or emitting fragrance; pleasantly odorous. 2. Smelling. Used with of boatwards redo-lent of tar. [Middle English, from Old French, from Latin red-o-i est, present participle of resistere, turcuit an odor re-, in response, back + olere, to smell (see ed-1 in Appendix").]

re-, in responsa, back + other, to smou (see set- in Appendix"), in responsa, back + other, to smou (see set- in Appendix"), red osser. A North American strub, Corner stolonifera, often forming dense clumps, and having red branches, white flowers, and bluish-white, berrytike fruit.

e-dou-bie (ré-dûb'al) v. -bied. -bing. -bies. -- r. 1. To double. 2. To repeat. 3. Archaie. To echo or re-echo. 4. To double the doubling bid of (an opponent in bridge). —intr. 1. To be doubled; become twice as much or as great. 2. Archaic. To echo; reverberate. 3. To double a double in bridge.

re-doubt (ri-dout) z. 1. A small, often temporary defensive fortification. 2. A reinforcing earthwork or breastwork within fortification. Z. A reinforcing earthwork or breastwork wighin a permanent rampart. 3. Any protected place of refuge or defense. [Old French redoute, from Old Italian ridotto, from Medieval Latin reductor, concealed place, from Latin, withdraw; from the past participle of reducere, withdraw; re-, back + discere, to lead (see deute in Appendix").]
re-itoubt-a-ble (ri-dou'ta-bel) adj. 1. Awesome; formidable; fearsome, 2. Worthy of respect or honor. [Middle English, from Old French redoutable, from redouter, to dread: re- (in-

1. To have an effect or consequences deeds that redound to one's 1. 10 nave an effect of consequences access that redound to one s discredit. 2. To return; recoil. Used with upon: Glory redounds upon the brane. 3. To contribute; accrue. [Middle English redounden, to abound, from Old French redonder, from Latin redundare, to overflow: red., re- (intensifier) + undare, to over-

reamount, to overlow: rose, re (inclusiver) + industre, to over-flow, surge, from usda, were (see west-1 in Appendix*).] re-dox (re'dôks') n. Chemistry, Oxideoton-reduction (see), red-pen-cil (red'pēn'sa) tr.x. -elled, -ciling, -sile. To censor, revise, or correct with or as if with a red peacil.

red papper, 1. The pungent, red, pounce fruit of easy of several varieties of the pepper plant, Capsician fruitescent, 2. Cayenne pepper (sec).

red pine. An evergreen timber tree, Pines restinate, of north-eastern North America, Also called "Norway pine." red-post (red'pol') a. Any of several funches of the genus Aconthis, having brownish plumage and a red crown.

Red Poll. Any of a broad of reddish, hornless cattle developed in England and raised for dairy and meat products, rad pucceon. A plant, the bloodroot (see), radress (ri-dress) in the second of the second seed of the second seed.

right: remody or rectify. 2. To make amends to. 3. To make amends for. 4. To adjust (a balance, for example). —See Syno-

nyms at convect. —s. (ri-drès', rè'drès). 1. Satisfaction or amends for wrong done. 2. Correction or reformation. —See Synonyms at reperation. [Middle English redresser, from Old French redresser: re-, back + dresser, to make straight, press.] 25' QC, 19 SOF IL

Red River. 1. A river of the southwestern United States, rising in the Texas Panhandle and flowing 1,018 miles along the Texas-Okiahoma boundary, through Arkansas, and into isiana to join the Mississippi. 2. A river of the United States and Canada, flowing northward 533 miles along the Minnesota-North Dakota boundary into Lake Winnipeg, Manitoba, Canada, Also called "Red River of the North." 2: Chinese Yu-on Klong (yoo-an' ji-ang'); Annumese Song Col (song'kor'). A river of China and North Victnam rising in Yunnam Province, China, and flowing in a southeasterly direction for about 730 miles past Hanoi to the Gulf of Tonkin.

red-root (red'root') n. 1. A bog plant, Lachnanthes tinctoria, of castern North America, having red roots and woolly yellow flowers. 2. Any of several plants having red roots, such as

pigweed (see).
rad salmon. The sociove salmon (see).

Red Sea. An elongated body of water, about 170,000 square miles in area, separating the Arabian Peninsula from Africa and connected with the Mediterranean by the Sucz Canal red-shenk (röd'shångk') a. An Old World weding bird, Triege totanur, having long red legs.

1. An apparent increase in the wavelength of radistion emitted by a recoding celestial body as a consequence of the Doppler effect (see). Z. A similar increase in wavelength

the Doppler effect (see). Z. A similar increase in wavelength resulting from loss of energy by radiation moving against a gravitational field. red-skin (red'skin') n. Informal. A North American Indian.

red snapper. Any of several marine food fishes of the geaus Luttonur, of tropical and semitropical waters, having red or

red equill. 1. A plant, the see enion (see). 2. A powder pro-

I pat/I pay/ir care/i father/b bih/ch church/d deed/ē pet/ē be/! fife/g gag/h but/hw which/i pie/ir pier/i judge/k bick/i ki

needla/m mum/n no, sudden/ng thing/5 pot/5 tee/6 pnw, for/oi neise/on est/55 teek/55 best/p pop/t rosr/s saucz/sh ship, fel/

pared from the bulbs of this plant and used as a rat points red squirrel. A North American squirrel, Tamieschaus in cur, having roodish or tawny lur. See oblatures.

car, having reciding at the rest feet. See observers meaning the feet of the f breast and tail. [200 + obsolete start, tail, from Middle En-lish stert. Old English steort (see start in Appendix.)]

red tage. Impedimental use of official forms and pro-[From the tape used to the English governmental occu-[From the tape used to the English governmental document] red tide. Ocean waters colored by the profiferation of red, escelled, plantilike animals in sufficient numbers to kill fish, red-top (rtd'tôp') s. A widely cultivated grass, Agrandi als, astive to Europa, having reddish flower chusters.

or mrange materially, 4. To separate into order components by analysis. 8. To bring to a certain state or components by analysis. tion. 4. To powder or pulverize. 7. To thin (paint) with a solvent. 8. Chemistry. a. To decrease the valence of (an steat by adding electrons. b. To decxidize. c. To add hydrogen a. d. To change to a metallic state by removing nonmetalic matitudes to smelt. 9. Mathematics. To change the form of in expression) without changing the value. remove some of the silver from (an excussion) forming a pl graphic image, 11. Surgery, To restore (a fractured or deplaced body part) to a normal condition. placod body part) to a normal continuou. — mer. 1. 10 tooms diminished. 2. To lose weight, as by dicting. — See Synogen at decrees. [Middle English subson, bring back, from Law reducere: re-, back, again + dicere, to lend (see dest- in Ap-pendix*).] — re-duc er n. — re-duc billion n. — re-duc'bil duc'i-biy acr.

reducing agent. A substance that chemically reduces our substances. Also called "reductant." re-duc-tase (ri-dilc'tis', -dir) a Any enzyme that catalyze blochemical reducions (REDUCT(ion) + -ast.] re-duc-ti-e ad ab-sur-dum (ri-dilc'tis-5 ad ob-sir'dom). Di-

proof of a proposition by showing the absurdity of its inevitale conclusion. [Latin, "reduction to absurdity."] re-duo-don (ri-dik'shon) n. Abbr. rest. 1. The act or process of reducing. 2. The result of reducing. 2. The amount by which anything is lessened or diminished. 4. Biology. The first moint division, in which the chromosome number is reduced. Als called "reduction division." 5. Chemistry, A decrease is posdivision, in which the carbon combine minor is reduced. As called "reduction division." 5. Chemistry. A decrease is pos-tive valence or an increase in negative valence by the gaining of electrons. Compare endeation. C. Mathematics. celing of common factors in the numerator and decora a fraction, b. The converting of a fraction to its decimal equi--Cld French or from Late Latin reduccio, from Latin, from reducere, to se-DUCE. --- re-duc'tion-et, re-duc'tive adi

duction division. Biology. 1. The first meiotic division a

reduction devision. Biology. 1. 1 see hits messure urman, and duction (see). 2. Melouie [see).
re-dure-den-cy (ri-din/dox-d) n., pl. -eiea. Also re-dure-duction (-doxs).
1. The state of being redundant. 2. Superfluity or excess. 3. Unnecessary repetition. 4. Technology. 2. Daylic-ductions of the state o tion or repetition of elements in electronic or mechanical equi-ment to provide alternative functional channels in case of hiure. b. Repetition of parts or all of a message to circu transmission errors.

re-dun-dent (ri-din'dent) ad. 1. Exceeding what is necessary or natural; superfluous. 2. Needlessly repetitive; vertex. [Latin redendars, present participle of redendars, to overlos, run back : red-, re-, back + undere, to overflow, from a wave (see wed-1 in Appendix*).] —re-dust density ask redupt. redupticate; reduptication; redupticative.

re-du-pil-cate (ri-do'pio-kii', ri-dyob'-) v. cated. esiag cates. — r. 1. To repest over and again; redouble, 2. Liguistics. a. To double (the initial syllable or all of a root word to produce an inflectional or derivational form, a. To form to word) by doubling all or part of a word. —int. Te ke bled. —adl. (ci-do) pis kit, n-dyos-1, Abbr. rempt. Deblod. [Late Latin reduplicare : Latin re-, again + do DUPLICATE.

DUPLICATE.]
re-du-pif-ca-tion (ri-dot/pla-kir/shoc, ri-dyot/-) n. Abbr. what
1. A reduplicating or the state of being reduplicated, 2.A
product or result of reduplicating, 3. A word formed by a
containing a reduplicated element, 4. The added element is a word form that is reduplicated. --re-du/pil-ca/tive ad. --

rad-wing (red'wing) s. 1. A North American blackbird, in-lains phoeniceus, the male of which has scarlet patches on the wings. Also called "red-winged blackbird." Z. A Estopes s Illacus, having reddish feathers under the wan red-wood (red'wood') s. 1. A very tall evergreen tree, Some sempervicess, of constal and northern California, Comest giant acquaiss. 2. The soft, reddish wood of this tree. 3. As a various woods of reddish color or yielding red dye.

re-cob-o (rf-fit'0) v. -oed. -oing. -oea. --intr. To coho beck sound back or reverberate again. --iv. To echo back soi repeat.

reed (rod) at 1. a. Any of various tall grasses having join hollow stalks: especially, one of the genera Phragment & Armsio. In The stalk of one of these plants. 2. A prison wind instrument made of such a hollow stalk, 2, Music. s.A. flexible strip of case or metal set into the mouthpiece of cause studical instruments to produce tone by vibrating in responsit

litted with a reed. with rood or metal . bread. See tereurt- in Reed (rod), John. Reed (rod), Walter. rescurch on yellow Med-buck (red'be) eding (redice) n. beving parallel strin nd-ling (rêd'ling) ismicus, of which red mace. A plan red organ. A keyl:

produce tones when d pipe. An orga sect a tone when mil ston. A mon My of various tone med-u-cate (rō-čj's instruct again, 2. T orhabilitate ned-y (rë'dë) adj. -i. 1. Rasambling a rec od i-nees a MI (sel) R. 1. Geol that rises to or pear A min. — Soc Synt Desch off, ridge, pe a Appendix."] lesses the area exp 1. To reduce tring it to or rolling or bowsprit) by taki Old Norse of, ridge her (seles) n. 2 A short, heavy, a er (re far) a Si יונג פני ווסז att mer knoe. A squam

resk (filk) v. reeked.

are off or become

comple). 2. To prmoke. —e. 1. A s

in Appendix."] -

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mel' (rdl) a. 1. A cy and is used for win-2. Such a device att. 44 one real. mel 2 To recover Me martin. 3. To 1 ment and dates but-1 in Appendix. mar (rd) v. recied, oc or fall bac érenkanne 4 To feel dizzy. regaring, swaying, sty from REEL (spe mel (rel) m. 1. A la md. 3. The music ! m-en-force, re-en-fi emter (ré-ča'tar) beer. bur. To unin on a list or k estrant (rō-ča'tr mering; pointing is +entrant angle, / 100 degroes

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- ex-em-ine (rč'le-; M. ro-fix-an 2 Law. To question -w-ac-am'i-ne' tior

t febe/th thin, peth. i/œ Fr.



Acanthis flammea



redwing Azelatus phoeniceus

WEBSTIR'S

New Collegiate Dictionary





a Merrian-Webster®

O. & C. MERRAM COMPANY Springfield, Musichusetts, U.S.A.

1980 (punipil @ 1973)



reflection 1: to put in or publication: EET (F. LL. reflections; EET (F. LL. reflections; reflec

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(the yellow birch (Beruis

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1ab; its hard wood

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The American Jewish Committee

PORTLAND CHAPTER, 1220 S.W. Morrison, Ste. 930, Portland, OR 97205 (503) 295-6761, FAX (503) 497-9054

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Administrative Vice Chair

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Jay Zidell

October 21, 1992

3

Whereas it is the mission of the American Jewish Committee to combat bigotry and promote intergroup relations, and;

Whereas the use of racial or ethnic stereotypes in the names, nicknames, or titles of business, professional, sport or other public entities is frequently dehumanizing, whether intended as such or not;

Whereas dehumanizing symbols create an environment in which dehumanizing acts become more acceptable;

Whereas many teams still sport names such as "Indians," "Braves," Redskins," "Chiefs," Redmen," etc;

Whereas such names are dehumanizing and promote practices that trivialize and demean people, religious beliefs and symbols;

THEREFORE, The American Jewish Committee, Portland, Chapter, opposes the use of racial or ethnic stereotypes in the names or titles of business, professional, sport or other public entities when the affected group has not chosen the name itself. The AJC/Portland chapter resolves to encourage such entities to end their use of offending stereotypes.

Passed at the Portland Chapter Board of Directors meeting on September 2, 1992.

Judith Kahn Area Director

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KAHN EXHIBIT NO.

American Jewish Committee Board of Directors

Minutes

Year Ahead Planning, September 2, 1992

Attendance Herb Newmark, Chair Bruce Blank Stuart Durkheimer Tom Georges, Jr. Merle Greenstein Jonathan Greenstein Eileen Hammer Wendy Leibreich Mark Levenson Miles Newmark Herb Newmark Barry Rosen John Rosenthal Mark Rutzick Jerry Sadis Dan Saltzman Richard Solomon David Urman

Staff: Judith Kahn

Guest: Gene DuBow, Community Service Department, AJC national

Gene DuBow from our office in New York spoke to the board on the present and future of AJC with emphasis on the changing social policy agenda. This informative sharing with the board set a tone to plan our own agenda for 1992-93.

Voted and passed a resolution against the use of Indian names for sports teams.

Membership - John Rosenthal
On September 16 there will be a phon-a-than to recruit new members
from a list of prospective member and lapsed members. We call to
explain about the Anne Frank exhibit and the work of AJC. John
will be travelling the state to make AJC statewide.

20,000 membership brochures will be available at the Anne Frank exhibit.

Financial Advisory Committee - Tom Georges
The Financial Advisory Committee purpose and specifically to the plate dinner encouraging the board to support our efforts. Board members only and only the few active participants in young leadership may attend the plate dinner at a reduced fee.

It was decided that Wendy will present the award to Marsha Congdon.

KAHN EXHIBIT NO. Young Leadership - Miles Newmark
The number of members of young leadership will increase so that at
least 10 attendees will be guaranteed at each meeting.

Judith reported on all possible dialoguing groups and invited people to join groups.

RFRA - Steve Forman
An update of activities locally and the politicians who have signed on was reported. The emphasis is on passing RFRA so the AIFRA will fall into place.

Media - Mark Levenson On Thursday, September 10 there will be a statewide press conference to speak out against Measure 9, all Jewish organization in the state have been invited to participate.

Jewish Continuity - Johathan Greenstein
The community is exploring the what, who and how of facing the rising assimilation and intermarriage.

Anne Frank - Wendy Liebreich An update on the Anne Frank exhibit was reported and it was asked that AJC board and its members get involved.

Reminder on Thursday, October 8 a special showing of the Anne Frank Exhibit at 8:00 p.m. in the First United Methodist Church on SW 18th and Jefferson. Guided tour by Cornelius Suijk, director of the International Anne Frank Exhibit.

Calendar was set for 1992-93 We will meet the 3rd Wednesday of every month. Every other month will be an open meeting for our members with a guest speaker. The dates are as follows:

November 18 December 16 January 20 February 17 March 17 April 21	guest speaker meeting	to d	hange ut of 1	to 1	Dec 10 56	chair
April 21 May 19						
June 16	meeting					

United States District Court

NORIHERN DISTRICT	OF <u>CALI</u> E	ORNTA
SUZAN SHOWN HARJO, RAYMOND D. APODACA, VINE DELORIA, JR., NORBERT S. HILL, JR., MATEO ROMERO, WILLIAM A. MEANS, et al. V. Petitioners PRO-FOOTBALL, INC. Respondent TO: Teresa D. LaFromboise Counseling Psychology Program	UNITED STA OFFICE BEFORE THE APPEAL BOA Cancellati	on No. 21,069
Stanford University Stanford, CA 94304-3096 YOU ARE COMMANDED to appear in the United States Dist testify in the above case.	DEPOSITION at the p	grande engage en regelste soch operationste til et det at 150 Hz.
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Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

- (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.
- (2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.
- (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.
- (3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it
 - (i) fails to allow reasonable time for compliance;
 - (ii), requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in per-

son, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

 requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA

- (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

BCHEDULE A

DEFINITIONS AND INSTRUCTIONS

The term "document" has the broadest meaning which can be ascribed to it pursuant to Rule 34 of the Pederal Rules of Civil Procedure. Among other things, the term "document" refers to and includes the final form and all drafts and revisions of any type of written or graphic matter, original or reproduced, and all copies thereof which are different in any way from the original, regardless of whether designated confidential, privileged or otherwise restricted. Without limiting the generality of the foregoing, the term "document" includes books, papers, letters, telegrams, memoranda, communications, minutes, notes, schedules, tabulations, vouchers, accounts, statements, affidavits, reports, abstracts, agreements, contracts, diaries, calendars, plans, specifications, drawings, sketches, photostats, photographs, charts, graphs and other similar objects, and any kind of transcript, transcription or recording of any conversation, discussion or oral presentation of any kind, and any information stored on, and reproducible in documentary form from a computer or other electronic information storage device, regardless of whether or not a privilege is claimed with respect to the production of such documents.

If a privilege is claimed with respect to any document, such document must be produced at the 30(b)(1) deposition to the stenographer for purposes of identification, and at such time the information set forth in Paragraph 11 herein must be provided to Respondent. Copies of the allegedly privileged document(s) produced to the stenographer at the 30(b)(1) deposition will not be produced to Respondent.

- 2. The term "concerning" means relating to, referring to, describing, evidencing, constituting or supporting.
- 3. The term "Report" refers to the expert disclosure of Theresa D. LaFromboise and all accompanying materials.
- 4. The term "Petitioners" refers to Suzan Shown Harjo, Raymond D. Apodaca, Vine Deloria, Jr., Norbert S. Hill, Jr., Mateo Romero, William A. Means, Manley A. Begay, Jr. and any agents, representatives and others acting on behalf of said Petitioners, either individually or collectively.
- 5. The phrase "the Cancellation Proceeding" refers to <u>Harjo, et al.</u> v. <u>Pro-Football, Inc.</u>, Cancellation No. 21,069, pending before the Trademark Trial and Appeal Board.

- 6. The term "communication(s)" means the transmittal of information in the form of facts, ideas, inquiries or otherwise, whether oral or written.
- 7. The term "person" refers to and includes natural persons, corporations, partnerships, proprietorships, joint ventures, unincorporated associations, trusts, estates, governments and agencies thereof, quasi-public entities and all other forms of specifically identifiable legal entities.
- 8. The phrase "registrations at issue" means those trademarks which are the subject of U.S. Registration Nos. 1,606,810; 1,343,442; 1,085,092; 987,127; 986,668; 978,824; and 836,122, as identified in the Petition for Cancellation.
- 9. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the document request all responses that might otherwise be construed to be outside of its scope.
- 10. The use of the singular form of any word includes the plural, and vice versa.
- 11. If a legal objection or privilege is claimed for any document (the "privileged document"), such privileged document shall be produced at the 30(b)(1) deposition as set forth in Paragraph 4 above, and the following information shall be produced to Respondent at such time:
 - a. the date of the privileged document;
 - b. the general character or type of privileged document (i.e., letter, memorandum, notes of meeting, etc.);
 - c. the identity of the addressee of the privileged document;
 - d. the identity of the addressor of the privileged document;
 - the identity of any recipient of the privileged document in addition to the addressee;
 - f. the identity of any other document ("other document") to which the privileged document has been attached and the identity of the

addressee, addressor and any other recipient of the other document to which the privileged document was attached.

- g. the general subject matter of the privileged document;
- h. the relationship of addressor, addressee and any other recipient of the privileged document;
- i. a description of any attachments to the privileged document (i.e., the general character or type of document attached; the general subject matter of the attachment; the addressee and addressor of the attachment, the date of the attachment, etc.);
- j. the identity of the person in possession of the privileged document; and
- k. the legal basis, including, but not limited to, any legal objection or privilege for withholding the document.
- 12. If any legal objection or privilege is claimed for any document (the "privileged document"), such legal objection or privilege does not extend to any document to which a privileged document is attached or to any attachments to a privileged document to which no privilege can be claimed.
- 13. If any document was, but no longer is, in Theresa D. LaFromboise's possession, custody, or control, state whether it has been lost, destroyed, transferred, or is missing or has otherwise been disposed of, and in each instance, explain the circumstances surrounding the disposition thereof and the date it occurred.

DOCUMENT REQUESTS

- 1. All documents and things concerning the Report prepared by Theresa D. LaFromboise for submission by Petitioners in the Cancellation Proceeding, including, but not limited to, drafts of the Report.
- 2. All documents and things concerning Theresa D.

 LaFromboise's participation in or support or sponsorship of,
 whether directly or indirectly, the claims asserted by
 Petitioners in the Cancellation Proceeding.
- 3. All documents and things, including copies of correspondence, concerning any communications between Theresa D. LaFromboise and Petitioners or their attorneys, Dorsey & Whitney, regarding the Cancellation Proceeding and/or the Report prepared by Theresa D. LaFromboise for submission by Petitioners in the Cancellation Proceeding.
- 4. Copies of correspondence between Petitioners and
 Dorsey & Whitney regarding the Cancellation Proceeding and/or
 the Report prepared by Theresa D. LaFromboise for submission
 by Petitioners in the Cancellation Proceeding on which Theresa
 D. LaPromboise was copied and/or sent copies.
- 5. All documents and things concerning any communication received by Theresa D. LaFromboise from any organization, entity, person or group of persons concerning the Cancellation Proceeding, the mark "Redskins" or any other

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trade names, trademarks, service marks, nicknames, logos or other identifying names or symbols of the Washington Redskins football club or any of the registrations at issue in the Cancellation Proceeding.

- communications made by Theresa D. LaFromboise to any governmental agency or official, whether federal, state or local, concerning the mark "Redskins" or any other trade names, trademarks, service marks, nicknames, logos or other identifying names or symbols of the Washington Redskins Football Club or any of the registrations at issue in the Cancellation Proceeding.
- 7. All documents and things concerning communications made by Theresa D. LaFromboise to any organizations, businesses, corporations, schools, professional and amateur sports teams or individuals concerning the mark "Redskins" or any other trade names, trademarks, service marks, nicknames, logos or other identifying names or symbols of the Washington Redskins Football Club or any of the registrations at issue in the Cancellation Proceeding.
- 8. All documents and things concerning any response received by Theresa D. LaFromboise to any of the communications described in Requests Nos. 6 and 7 above.

9. All documents and things concerning any funds, donated, given, bequeathed, granted, loaned or allocated to Theresa D. LaFromboise, from any entity, person or group of persons to support Petitioners' efforts to have the registrations at issue in the Cancellation Proceeding cancelled.

Expert Report for Theresa D. LaFromboise

I. Background and Qualifications

- A. Theresa LaFromboise is Associate Professor of Counseling Psychology at Stanford University. She is the author of numerous publications and has served as a consultant for numerous agencies in the United States and Canada. A copy of her curriculum vitae is attached.
- B. Professor LaFromboise is expected to testify regarding the psychological and cultural challenges facing Native Americans, especially Native American youth, the psychological harm that results from the disrespectful use of Native American cultural symbols by the dominant culture, and the psychological impact on Native Americans of the use of the term "Redskins" as the name of a professional football team.

II. Opinions that Professor LaFromboise is Expected to Offer, and the Basis for those Opinions

- A. Professor LaFromboise will describe generally the field of Counseling Psychology. This field is oriented toward treating individual psychological problems through interaction with a therapist, and the cultural backgrounds of the patient and therapist are critical to that relationship
 - 1. Factors that affect patients' and therapists' psychological profile include gender, wealth, age, appearance, health, and cultural background, among others.
 - 2. The Success of the Therapist-Patient Relationship Hinges Upon Communication Between the Therapist and the Patient
 - a) Successful communication requires that the therapist understand how the patient perceives the world, her place

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Theresa D. LaFromboise Disclosure

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June 10, 1996 Page 1 of 10 in the world, and her modes of interaction with others

- b) Successful communication requires that that therapist understand how the therapist's own appearance and behavior may influence the patient.
- c) Successful communication requires that the therapist understand her own perspectives and biases in interpreting the actions of the patient
- 3. Professor LaFromboise has specialized in the study of culture as a factor in the patient-therapist relationship, particularly the interaction between Native American cultures and Euro-American culture.
- B. Professor LaFromboise is expected to testify that the study of cultures within the field of counseling psychology distinguishes between "dominant cultures" and "minority cultures"
 - 1. A "dominant culture" is defined as a culture that has successfully structured society around its institutions, norms, beliefs, and modes of thought and behavior. This may include forcing minority cultures to conform to its norms.
 - 2. A "minority culture" is defined as culture that exists as an identifiable subgroup with its own norms, beliefs, and modes of thought and behavior, but whose members must accommodate and adapt to the dominant culture in order to function in society.
- C Professor LaFromboise is expected to testify that Native Americans form a minority culture within the dominant "Euro-American" culture of the United States
 - 1. Although there are many diverse Native American cultures, all share aboriginal roots and radical transformation by contact with Euro-American culture

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Theresa D. LaFromboise Disclosure

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- a) Native American culture is a "minority culture" in the United States not only because Native Americans are numerically fewer, but because Native American lands, peoples, and customs have been destroyed, assimilated, and transformed by Euro-American culture, often by force
- 2. Euro-American culture is the "dominant culture" because Euro-American laws, customs, and ways of thinking form the core of most legal and social institutions in the United States, and these have been imposed on minority cultures.
 - a) Native Americans have been largely denied rights of self-determination
 - (1) Congress has supreme authority over Native Americans
 - (2) Congress has frequently and radically shifted policies toward Native Americans. For example:
 - (a) BIA interference
 - (b) Treaty abrogations
 - (c) Interference in tribal elections
 - (d) Policies in succession promoting separation, assimilation, allotment, termination, and re-organization
 - b) Native Americans have been denied the right to practice many traditional customs and religious practices through, for example:
 - (1) Restrictions on use of animal products (e.g. eagle feathers)

June 10, 1996 Page 3 of 10

- (2) Restrictions on access to sacred lands
- D. Professor LaFromboise is expected to testify that psychological health for Native Americans is facilitated by "Bi-cultural Competence," defined as familiarity and ability to function in both Euro-American and Native American modes. This is because most Native Americans face dual-cultural demands.
 - 1. Native Americans must understand and be able to communicate in the forms of Euro-American culture, because those forms are dominant in the United States
 - a) Failure to function in Euro-American culture greatly restricts Native Americans' economic, professional, and social opportunities.
 - 2. Native Americans who abandon or fail to participate in Native American culture pay a high social and psychological price
 - a) Euro-American culture does not accept Native Americans as equal participants
 - b) Participation in their heritage provides Native Americans with a source of psychological support
- E. Professor LaFromboise is expected to testify that conflicts between the dominant and minority cultures place great psychological strain on members of the minority culture that seek Bi-Cultural competence
 - 1. When the dominant and minority cultures come into conflict members of the minority culture may be forced to choose sides or suppress their cultural identities and loyalties. This is referred to as "antagonistic acculturation."

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- a) If the minority member conforms to the norms of the dominant culture by abandoning or suppressing her native culture, she may suffer psychological harm.
- b) If the minority member conforms to the norms of the minority culture, and rejects or suppresses the norms of the dominant culture, she may feel and be treated as an outcast by the dominant group, with severe economic, social, and psychological consequences.
- 2. The effects of antagonistic acculturation vary by individual
 - a) Resilient, highly functioning individuals can cope, but suffer ongoing psychological stress
 - b) More vulnerable individuals may be left in a psychological "no-man's land," resulting in observable outward effects, including:
 - (1) Depression
 - (2) Alcoholism
 - (3) Suicide
 - (4) Family abuse
 - (5) Anti-social behavior
- F. Professor LaFromboise is expected to testify that the use of the symbols of a minority culture by the dominant culture communicates messages to the minority culture
 - 1. The fact of the use communicates messages

June 10, 1996 Page 5 of 10

- a) If the dominant culture uses the symbols with the permission or participation of representatives of the minority culture, the fact of the use may provide psychological strength or affirmation to members the minority culture
- b) If the dominant culture appropriates the symbols without the permission or participation of representatives of the minority culture, the fact of appropriation emphasizes the powerlessness of the minority culture
 - (1) Here, the football team persists in the use of "Redskins" despite clear and well-publicized protests
- 2. The form of the use communicates messages
 - a) If the form of the use is positive or associates the minority culture with positive qualities, this communicates a positive message to members of the dominant and minority cultures
 - b) If the form of the use communicates a negative message or associates the minority culture with negative qualities, this communicates a negative message to members of the dominant and minority cultures.
 - (1) Use of "Redskins" by the Washington football team highlights a "romanticized" view of Native Americans, i.e, that they are a savage war-like people, suitable for invoking fear in one's opponents.
- G Professor LaFromboise is expected to testify that the history of the relationship between Native American and Euro-American culture is marked by oppression of Native American Cultures by Euro-American culture

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- 1. Euro-American culture has historically viewed Native American culture as having little worth
- 2. Euro-American culture has historically ignored important aspects of Native American life and culture
 - a) Euro-American culture has devoted almost no effort to understanding the role of women in Native American Society
 - (1) There is widespread ignorance, for example, that the Iroquois and other tribes were matriarchal societies (the Iroquois Great Law of Peace was an equal rights statute for men)
 - b) There is widespread ignorance of the consensus-based decisionmaking of most Native American societies
- 3. Euro-American culture has historically distorted or caricatured other aspects of Native American life and culture
 - a) Euro-American culture has historically exaggerated Native Americans' propensity for warfare and behavior during war
 - b) Euro-American culture portrays Native American women in limited forms
- H. Professor LaFromboise is expected to testify that this history of conflict and oppression means that most Native Americans take very seriously the messages communicated by Euro-American culture.
- I. Professor LaFromboise is expected to testify that Euro-American dominance over and hostility toward Native American cultures is recognized as a causal factor in numerous widespread Native American psychological problems:

June 10, 1996 Page 7 of 10

- 1. Low academic achievement
- 2. Anger at self, others
- 3. Depression
- 4. Alcoholism
- 5. Suicide
- 6. Family Abuse
- J. Professor LaFromboise is expected to testify that the term "Redskin(s)" is widely recognized among Native Americans as a disparaging term for Native Americans
 - 1. As a person of Native American descent, Dr. LaFromboise will testify that she has always understood the term "Redskin(s)" to be a disparaging term for Native Americans.
 - 2. As a scholar who specializes in the study of Native American psychology, Dr. LaFromboise has had broad contact with Native Americans throughout the United States and exposure to the literature of Native American psychology
 - a) With rare exceptions, the term "Redskin(s)" is consistently used by the Indian students that she has worked with as a disparaging term for Native Americans.
 - b) Dr. LaFromboise has never written a scholarly manuscript, and is not aware of scholarly manuscripts written by others, that refer to Native Americans as "Redskin(s)" except to draw attention to the disparaging character of the term.

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- 3. The results of the Ross Survey are consistent with this conclusion.
- K. Professor LaFromboise is expected to testify that the use of the term "redskins" as the name of a professional football team is psychologically harmful to many Native Americans, particularly children
 - 1. For those who know what the term "Redskin(s)" has meant, its use communicates the following messages, contributing to the effects noted above
 - a) It emphasizes the powerlessness of Native Americans
 - b) It trivializes Native American history
 - c) It insults their culture
 - d) It communicates that they belong to a worthless people, notable only for their ferocity
 - e) It forces a choice between the team/participation in the sport/enjoyment of professional football and their culture
 - 2. For those who do not know what it means, the term nonetheless creates the future possibility of psychological dissonance
 - a) As children later learn of the term's disparaging meaning, they are forced to choose between their enjoyment of football and their dislike of the name, or to suppress their opinions to conform, with the effects noted above

III. Documents on Which Professor LaFromboise's Opinions Will be Based

Professor LaFromboise will base her opinion on various scholarly publications, her clinincal experiences, and her own researches in the field.

Dorsey & Whitney LLP
Theresa D. LaFromboise Disclosure

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CURRICULUM VITAE

TERESA D. LAFROMBOISE

CURRENT WORK ADDRESS

Counseling Psychology Program School of Education Stanford University Stanford, CA 94305-3096 415/723-1202

ACADEMIC BACKGROUND

Ph.D. Counseling Psychology, University of Oklahoma, Norman, 1979

M.Ed. Elementary Education, University of North Dakota, Grand Forks, 1975

B.A. Liberal Arts, Butler University Indianapolis, Indiana, 1971

ACADEMIC APPOINTMENTS

Associate Professor Counseling Psychology

Stanford University

1994-present

Associate Professor Counseling Psychology & Counselor Education

American Indian Studies Program University of Wisconsin-Madison

1989-1994

Faculty Associate Wisconsin Center for Education Research

University of Wisconsin-Madison 1990-present

Research Associate National Center for American

Indian/Alaska Native Mental Health Research Department of Psychiatry, University of Colorado

1986 to present

Assistant Professor Counseling Psychology

Stanford University, 1985 to 1989

Visiting Assistant Professor

Psychology, Stanford University,

1983 to 1984

Counseling Psychology, Stanford University

1984 to 1985

Assistant Professor

Counseling Psychology

University of Nebraska-Lincoln

1979 to 1984

Teaching Assistant

Counseling Psychology Oklahoma University

1976 to 1978

COURSES TAUGHT

Career and Personal Counseling in Cross-Cultural Settings Clinical Supervision

Comparative Professional Survey

Cognitive Behavior Modification

Counseling Practicum Group

Counseling Practicum Supervision

Counseling Theories and Interventions

Counseling Theories and Interventions from a Multicultural Perspective Cross-Cultural Counseling

Cross-Cultural Counseling: American Indians and Whites

Educational Psychology

Field Experience

History and Systems of Psychology

Peer Counseling

Psychology and American Indian Mental Health

Social and Psychological Aspects of Group Counseling

RESEARCH INTERESTS

American Indian Communication and the Counseling Process Bicultural Competence

Social Influence in Cross-Cultural Counseling

Social Skills Interventions for Life Skills Development

RESEARCH/CLINICAL/TEACHING EXPERIENCE

Instructor

Counseling and American Indian Mental Health

Lac Courte Oreilles Community College

Hayward, Wisconsin, 1991

Instructor

The Malaysian and Indonesian Special Workshop in Educational

Management and Development for Senior Southeast Asian Educators

Participant

Summer Institute on Human Development and Psychopathology

Center for Advanced Study in Behavioral Sciences

Stanford University, 1990

Instructor

Department of Psychiatry Grand Rounds

Stanford University, 1990

Instructor

Continuing Education for Health Professions

Pacific University, 1990

Instructor

Continuing Education for American Indian Counselors

Northern State College, 1989 Aberdeen, South Dakota

Instructor

Psychology Department Faculty Seminar

Department of Psychology

University of California-Los Angeles, 1989

Instructor

Community Psychology Program

California School of Professional Psychology Los Angeles, 1989

Educational Leader Professional Seminar Consultant

Soviet Union Tour, 1987; East African Tour, 1988.

Instructor

School of Education

Harvard University, 1985

Psychologist

Cowell Student Health Center

Stanford University, 1984-1985

Psychologist

Urban Indian Health Clinic, Inc.

San Francisco, 1985

Director

Oklahoma City Indian Youth Services

Native American Center, Oklahoma City, 1977

Counselor

Crisis Intervention Center Louisiana State University

Baton Rouge, 1975

Teacher

Homebound Tutor

Norman Public Schools

Norman, Oklahoma, 1976-1978

Teacher

American Indian Culture Mt. Pleasant High School Mt. Pleasant, 1973-1974

Teacher

Ojibwa School

Turtle Mountain Chippewa Reservation Belcourt, North Dakota, 1971-1973

HONORS

Outstanding Mentor, Stanford American Indian Organization, 1995

Women of Color Psychologies Award, Association for Women in Psychology, 1992

Fellow, Center for Advanced Study in the Behavioral Sciences, 1990

Fellow, American Psychological Association, Division 45 - 1988, Division 17 - 1991

Outstanding Alumnae, Vincennes University, 1986

Distinguished Scholar, American Educational Research Association (AERA), 1985

Outstanding Contributions, National Lutheran Board, 1983

Fellow, Bilingual Bicultural Fellowship, University of Oklahoma, 1978-79

RESEARCH GRANTS

Recipient

Pre-Convention Workshop on Program Development and Research

National Institute on Education Boston, Massachusetts, 1980

Research Associate

Elderly Reactions to Natural Disasters National Institute of Mental Health Western Washington University Bellingham, Washington, 1980

Principal Investigator

Summer Institute in Cross-Cultural Counseling for Teachers and Administrators

Nebraska State

Department of Education

University of Nebraska-Lincoln, 1981

Principal Investigator

Conference on the Professionalization of American Indian Women

in Postsecondary Education U.S. Department of Education

Women's Educational Equity Act Project University of Nebraska-Lincoln, 1981-1982.

Principal Investigator Cultural Issues in the Professionalization of American Indian Women

Lincoln and Cooper Foundations Lincoln, Nebraska, 1981-1983

Recipient

Prevention Research Training with Special Populations

National Institute of Mental Health

Rockville, Maryland, 1983

Recipient

Coping Skills and Cultural Strengths of American Indian Women

National Lutheran Board Chicago, Illinois, 1983

Principal Investigator

Coping with Life Transitions of Indian College Students

The Spencer Foundation Chicago, Illinois, 1985

Recipient

American Indian Research Grant The Randolph Foundation

Minneapolis, Minnesota, 1988

Recipient

Psychological Aspects of Bicultural Competence. National Center for American Indian Mental Health Research. Denver, Colorado,

Recipient

Indian Modeling Therapy Project

Ojibwa Indian School

Belcourt, North Dakota, 1989

Recipient

Zuni Life Skills Development Project

Zuni Public Schools

Zuni, New Mexico, 1987-1991

Principal Investigator

Behavioral Study of Zuni Life Skills Development Project

School of Graduate Studies University of Wisconsin

Madison, Wisconsin 1990-1991

Recipient

Life Skills Development Curriculum Evaluation

Cherokee Nation

Tahlequah, Oklahoma, 1991-1992

Research Associate

American Indian Teen Pregnancy Project

School of Pharmacy, University of Wisconsin-Madison and Great Lakes

Intertribal Council, 1993

Recipient

Minority Investigator

Rural Native Americans: A Minority Youth Intervention.

National Institute of Child Health and Human Development, Bethesda, Maryland, 1993-1995.

Recipient

Profile of Effective American Indian Parenting Grant,

Center for the Improvement of Child Caring, Studio City, California, 1993.

ARTICLES IN PROFESSIONAL JOURNALS

LaFromboise, T., Dauphinais, P., Rowe, W. (1980). Indian students' perceptions of positive helper attributes. Journal of American Indian Education, 19, 11-16.

Dauphinais, P., LaFromboise, T., & Rowe, W. (1980). Perceived problems and sources of help of Oklahoma Indian students. Counselor Education and Supervision, 20, 37-44.

LaFromboise, T., Dauphinais, P., & Lujan, P. (1981). Verbal indicators of insincerity as perceived by American Indians. Journal of the Association for Non-White Concerns, 9, 87-94.

LaFromboise, T., & Dixon, D. (1981). American Indian perceptions of trustworthiness in a counseling interview. Journal of Counseling Psychology, 28, 135-139.

LaFromboise, T., & Plake, B. (1983). Toward meeting the educational research needs of American Indians. Harvard Education Review, 53, 45-51.

- LaFromboise, T. (1983). The factorial validity of the Adult Self-Expression Scale with American Indians. Educational and Psychological Measurement, 43, 547-555.
- LaFromboise, T. & Rowe, W. (1983). Skills training for bicultural competence: Rationale and application. <u>Journal of Counseling Psychology</u>, 30, 589-595.
- LaFromboise, T. (1984). Professionalization of American Indian women in postsecondary education. <u>Journal of College Student Personnel</u>, 25, 470-472.
- LaFromboise, T., & Plake, B. (1984). A model for the systematic review of mental health research: American Indian family, a case in point. White Cloud Journal of American Indian Mental Health, 3, 44-52.
- LaFromboise, T. (1985). The role of cultural diversity in counseling psychology. <u>The Counseling Psychologist</u>, <u>13</u>, 649-655.
- Pamoles, J., Claiborn, C., & LaFromboise, T. (1986). Effects of Black students' racial identity on perceptions of White counselors varying in cultural sensitivity. <u>Journal of Counseling</u>

 <u>Psychology</u>, <u>33</u>, 57-61.
- Claiborn, C., LaFromboise, T., & Pamoles, J. (1986). Cross-cultural counseling process research:

 A rejoinder. <u>Journal of Counseling Psychology</u>, 33, 220-221.
- Cohen, E., D'Amico, S., Duran, R., Escobedo, T., Garibaldi, A., Gonzalez, R., Gray, L., Guthrie, C., & LaFromboise, T. (1986). Minority participation in the 1984 AERA annual meeting. <u>Educational Researcher</u>, <u>15</u>, 12-16.
- LaFromboise, T. D. (1987). Special commentary from the Society of Indian Psychologists.

 <u>American Indian and Alaska Native Mental Health Research</u>, 1, 51-53.
- LaFromboise, T. (1988). American Indian mental health policy. American Psychologist, 43, 388-397.
- LaFromboise, T., & BigFoot, D. (1988). Cultural and cognitive considerations in the prevention of American Indian adolescent suicide. <u>Journal of Adolescence</u>, <u>11</u>, 139-153.
- Brammer, L., Alcorn, J., Birk, J., Gazda, G., Hurst, J., LaFromboise, T., Newman, R., Osipow, S., Packard, T., Romero, D., & Scott, N. (1988). Organizational and political issues in Counseling Psychology: Recommendations for change. The Counseling Psychologist, 16, 407-422.
- LaFromboise, T., Trimble, J., & Mohatt, G. (1990). Counseling intervention and American Indian tradition: An integrative approach. The Counseling Psychologist, 18, 628-654.

- LaFromboise, T., & Fleming, C. (1990). Keeper of the fire: A profile of Carolyn Attneave.

 Journal of Counseling and Development, 68, 537-547.
- LaFromboise, T., Heyl, A., & Ozer, E. (1990). Changing and diverse roles of women in American Indian cultures. Sex Roles, 22, 455-476.
- LaFromboise, T.D., Coleman, H.L.K., & Hernandez, A. (1991). Development and factor structure of the Cross-Cultural Counseling Inventory-Revised. <u>Professional Psychology:</u> Research and Practice, 22, 380-388.
- LaFromboise, T.D., & Foster, S.L. (1992). Cross-cultural training: Scientist-practitioner model and methods. The Counseling Psychologist, 20, 472-489.
- BigFoot, D.S., Dauphinais, P., LaFromboise, T.D., Bennett, S.K., & Rowe, W. (1992). American Indian secondary school students' preferences for counselors. <u>Journal of Multicultural Counseling and Development</u>, 20, 113-122.
- Howard-Pitney, B., LaFromboise, T. D., Basil, M. A., September, B., & Johnson, M. (1992).

 Psychological and social indicators of suicide ideation and suicide attempts in Zuni adolescents.

 Journal of Consulting and Clinical Psychology, 60.
- LaFromboise, T. (1992). An interpersonal view of the impact of affinity, clarification, and helpful responses with American Indians. <u>Professional Psychology: Research and Practice</u>, 23,281-286.
- LaFromboise, T.D., & Howard-Pitney, B. (1993). The Zuni Life Skills Development curriculum: A collaborative approach to curriculum development. American Indian and Alaska Native Mental Health Research, The Journal of the National Center, 4, Monograph, 98-121.
- LaFromboise, T., Coleman, H., & Gerton, J. (1993). Psychological aspects of bicultural competence: Evidence and theory. <u>Psychological Bulletin</u>, 114, 395-412.
- LaFromboise, T.D, & Howard-Pitney, B. (1995). The Zuni Life Skills Development Curriculum: Description and evaluation of a suicide prevention program. <u>Journal of Counseling Psychology</u>, 42,479-486.
- LaFromboise, T.D., & Trimble, J.E. (in press). Carolyn Lewis Attneave (1920-1992). American Psychologist.
- Bee Gates, D., Howard-Pitney, B., LaFromboise, T., & Rowe, W. (in press). Help-seeking behavior of American Indian high school students. <u>Professional Psychology: Research and Practice</u>

MANUSCRIPTS/BOOKS IN PREPARATION

- Shiang, J., Gibbs, J., Gray-Little, B., LaFromboise, T., Padilla., A., & Sue, S. (in preparation). <u>Psychological practice in a multicultural society: Theory, research, and cases.</u> New York: Oxford Press.
- LaFromboise, T., Morrow. J., & Coleman, B. (in preparation). An interpersonal view of the impact of affinity, clarification, and helpful responses with African American, Asian American, Hispanic, and European American university students.
- LaFromboise, T., & Ramirez, G. (in preparation). American Indian mental health policy. Update American Psychologist, 1988, 43, 388-397 article for D.W. Sue, & D. Atkinson (Ed.), Counseling American minorities: A cross-cultural perspective 5th edition. Madison, WI: Brown and Benchmark.
- LaFromboise, T. (in preparation). Use of Native American storytelling in therapy. Invited article for <u>Professional Psychology: Research and Practice</u>.

CHAPTERS IN BOOKS

- LaFromboise, T., & LaFromboise, R. (1982). Critical legal and social responsibilities facing Native Americans. In L. French (Ed.), <u>Indians and criminal justice</u> (pp. 21-38). Totowa, NJ: Allenheld, Osmun & Co.
- Trimble, J., LaFromboise, T., Mackey, D., & France, G. (1983). American Indian psychology and curriculum development: A proposed reform with reservations. In J. Chunn, P. Dunston, & F. Ross-Sheriff (Eds.) The core mental health disciplines and people of color: Issues of curriculum development strategy and change (pp. 43-64). Washington, DC: Howard University Press.
- LaFromboise, T. & Rudes, B. (1983). Student attendance and retention. In Development Associates (Ed.), The evaluation of the impact of the Part A Entitlement Program funded under Title IV of the Indian Education Act (pp. 183-204). Washington, DC: U.S. Department of Education Contract No. 380-80-0862.
- Hopstock, P., & LaFromboise, T. (1983). Knowledge and aspirations of current public high school students with respect to post-secondary academic opportunities. In Development Associates (Ed.), The evaluation of the impact of the Part A Entitlement Program funded under Title IV of the Indian Education Act (pp. 267-278). Washington, DC: U.S. Department of Education Contract No. 380-80-0862.
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- LaFromboise, T. D., & Graff Low, K. (1989). American Indian children and adolescents. In J. T. Gibbs, & L. N. Huang (Eds.), Children of color: Psychological interventions with minority youth (pp. 114-147). San Francisco, CA: Jossey-Bass.
 - LaFromboise, T. D., & Foster, S. (1988). Ethics in multi-cultural counseling. In P. Pedersen, W. Lonner, & J. Trimble (Eds.), Counseling across cultures (3rd Ed.) (pp. 115-136). Honolulu, HI: University of Hawaii Press.
 - LaFromboise, T., & Fleming, C. (1990). Keeper of the fire: A profile of Carolyn Attneave. Reprinted in P. Heppner (Ed.), <u>Pioneers in counseling and human development: Personal and professional perceptions</u>. Alexandria, VA: American Association of Counseling and Development.
- LaFromboise, T. (1992). American Indian women. In L. Jones (Ed.), <u>The encyclopedia of career change and work issues</u>. Phoenix, AZ: Oryx Press.
- LaFromboise, T. (1993). American Indian mental health policy. Reprinted in D. Atkinson, G. Morten, & D. W. Sue (Eds.), Counseling American minorities (3rd Ed.) (pp. 123-144). Dubuque, IA: Wm. C. Brown.
- LaFromboise, T., Trimble, J., & Mohatt, G. (1993). Counseling intervention and American Indian tradition: An integrative approach. Reprinted in D. Atkinson, G. Morten, & D. W. Sue (Eds.), Counseling American minorities (3rd Ed.) (pp. 145-170). Dubuque, IA: Wm. C.
- LaFromboise, T.D., Heyle, A. & Ozer, E.J. (1993). Changing and diverse roles of women in American Indian cultures. Reprinted in A. Kesselman (Ed.), Women's images and realities: A multicultural anthology of women in the United States. Mountain View, CA: Mayfield.
- LaFromboise, T.D., Heyle, A., & Ozer, E.J. (1993). Changing and diverse roles of women in American Indian cultures. Reprinted in R.N. Wells (Ed.), Native American resurgence and renewal: The struggle for self-determination and respect, a reader and bibliography. Metuchen, NJ: Scarecrow.
- LaFromboise, T.D. (1993). American Indian mental health policy. Reprinted in R.N. Wells (Ed.), Native American resurgence and renewal: The struggle for self-determination and respect, a reader and bibliography. Netuchen, NJ: Scarecrow.
- LaFromboise, T. (1993). American Indian women. In J. Sanchez-Hacles (Ed.), <u>Bibliography on women and mental health</u>. Norfolk, VA: Old Dominion University.
- LaFromboise, T.D., Heyle, A., & Ozer, E. J. (1993). Changing and diverse roles of women in American Indian cultures. Reprinted in W. Flemming (Ed.), <u>Visions of an enduring people</u>. Dubuque, IO: Kendall Hunt.

- LaFromboise, T. D., Berman, J.S., & Sohi, B.K. (1994). American Indian women. In L. Comas-Diaz, & B. Greene (Eds.), <u>Psychotherapy with women of color</u> (pp. 30-71). New York:
- Hill, H., Soriano, F.I., Chen, S.A., & LaFromboise, T.D. (1994). Sociocultural factors in the etiology and prevention of violence among ethnic minority youth. In L. Eron, J. Gentry, & P. Schlegel (Eds.), Reason to hope: A psychosocial perspective on violence and youth (pp. 59-97). Washington, DC: American Psychological Association.
- LaFromboise, T.D., Coleman, H.L.K., & Gerton, J. (1994). Psychological impact of biculturalism: Evidence and theory. Reprinted in N. Goldberger, & J. Veroff (Eds.), <u>Essential papers in cultural psychology</u>. New York: New York University Press.
- LaFromboise, T., Running Wolf, P., & Bigfoot D.S., (1994). Toward the development of a self-efficacy scale for American Indian Women. In Carter, R.T. & Johnson, S.D. (Eds.) <u>Teachers College Winter Roundtable on Cross-Cultural Counseling and Psychotherapy conference proceedings</u> (pp. 15-29). New York: Columbia University.
- LaFromboise, T., Foster, S., & James, A. (1995). Ethics in multicultural counseling. In P. Pedersen, W. Lonner, & J. Trimble (Eds.), Counseling across cultures (pp. 47-72). Thousand Oaks, CA: Sage.
- LaFromboise, T.D., Choney, S.B., James, A., & Running Wolf, P.(1995). American Indian Women and psychology. In H. Landrine (Ed.), <u>Cultural diversity in feminist psychology:</u> Theory, research, and practice. (pp. 197-239). Washington, DC: American Psychological Association.
- LaFromboise, T.D., & Howard-Pitney, B. (1995). Suicidal behavior in American Indian female adolescents. In S. Canetto, & D. Lester (Eds.), Women and suicidal behaviors (pp. 157-173). New York: Springer.
- LaFromboise, T., Trimble, J. & Mohatt, G. (1995). Counseling interventions and American Indian traditions: An integrative approach. Reprinted in K. Monteiro (Ed.), Ethnicity and psychology (pp. 314-334). Dubuque, IO: Kendall/Hunt.
- LaFromboise, T.D., Coleman, H.L.K., & Gerton, J. (1995). Psychological impact of biculturalism: Evidence and theory. Reprinted in S.E. Taylor & L.A. Paplau (Eds.), Sociocultural perspectives in social psychology. New York: Prentice Hall.
- LaFromboise, T., Trimble, J., & Mohatt, G. (1995). Counseling intervention and American Indian tradition: An integrative approach. Reprinted in R. Hornby (Ed.), Alcohol and Native Americans (pp. 149-169). Rosebud, SD: Sinte Gleska University Press.

- LaFromboise, T., & Jackson, M. (1995). Multicultural theory and Native American Indian populations. In D.W. Sue, A.E. Ivey, & P.D. Pedersen (Eds.), A theory of multicultural counseling and therapy. (Pp. 192-203). Pacific Grove, CA: Brooks/Cole.
- LaFromboise, T., & Young, K. (in press). American Indian and Alaska Native mental health. In P. Pedersen & D. Locke (Eds.), <u>Culture and diversity issues in counseling</u>. Greensboro, NC: ERIC/CASS.

BOOKS/CURRICULA

- LaFromboise, T. (1983). <u>Assertion training with American Indians</u>. Las Cruces, NM: ERIC Clearinghouse on Rural Education and Small Schools.
- LaFromboise, T. (1989). <u>Circles of women: Skills training for American Indian professionalization</u>. Newton, MA: Women's Educational Equity Act Press.
- LaFromboise, T. (1991). Zuni life skills development curriculum. Palo Alto, CA: Stanford Health Promotion Resource Center.
- LaFromboise, T. (1996). American Indian life skills development curriculum. Madison, WI: University of Wisconsin Press.

INSTITUTE REPORTS/NEWSLETTER ARTICLES

- Rowe, W., & LaFromboise, T. (1979). Cultural adaption of assertive training with Indians. (LOAN Interspect 3, 4; Norman, OK: U.S. Teacher Corps Network.
- LaFromboise, T. (1982). Indian women examine professionalization. OHOYO Newsletter, 13, 3.
- LaFromboise, T. & Kumar K. (1983). Survey of AERA minority membership. Washington, DC: AERA Minority Standing Committee on the Role and Status of Minorities in Research and Development.
- LaFromboise, T. & Pope-Davis, D. (1984). Graduate minority student stress at Stanford University: Development and validation of the Student Stress Inventory. Stanford, CA: Dean of Students Office, Stanford University.
- Acosta, F., Baron, A., Bestman, E., LaFromboise, T., Liu, W., Marsalla, A., Padilla, A., & Takeuchi, D. (1987). Outcome of mental health services delivery. In F. Cheung (Ed.) Minority mental health services research conference proceedings (pp. 48-54). Rockville, MD: Minority Research Resources Branch, Division of Biometry and Applied Sciences, National Institute of Mental Health.
- LaFromboise, T. D. (1992). In obligation to our people: Giving merit to cultural and individual differences. Requested as a reprint Division 45 Newsletter Focus, 6(1), 11-14.

- Sohi, B.K., LaFromboise, T., & Berman, J.S. (1992). Therapy with American Indian Women. Division 45 Newsletter Focus, 6 (2), 12-13.
- LaFromboise, T. (1994). American Indians in psychology: A journey through the life of Carolyn Attneave. Division 45 Newsletter Focus, 8 (2), 11-14.
- LaFromboise, T. (1995). Conference excerpt. Newsletter of the Center for Intercultural Clinical Psychology, 3 (1).
 - LaFromboise, T., & Rowe, W. (1995). <u>American Indian Cultural Orientation Scale manual</u>. Stanford, CA: School of Education.
 - LaFromboise, T. (1996, February). Native American focus groups report. Stanford, CA: Board of Trustees of Stanford University.

BOOK REVIEWS

- LaFromboise, T. D. (1983). (Review of "Social competence"). Cognitive Behavior Therapy Newsletter, 5, 15-16.
- LaFromboise, T. D. (1983). (Review of "Minorities in American higher education"). <u>Journal of College Student Personnel</u>, 24, 170-172.
- LaFromboise, T. D., & Parent, E. A. (1985). (Review of "The hidden half: Studies of Plains Indian women"; "American Indian women: Telling their lives"; "Sinister wisdom, a gathering of spirit"; "Native American women: A contextual bibliography"). SIGNS: Journal of Women in Culture and Society, 10, 782-785.
- LaFromboise, T., & BigFoot, D. (1987). (Review of "Psychosocial research on American Indian and Alaska Native youth"). American Indian Culture and Research Journal, 9, 111-113.

MAJOR PRESENTATIONS AT PROFESSIONAL CONFERENCES

- LaFromboise, T. D. (1977, March). Consideration in training Native American paraprofessional counselors. Paper presented at the meeting of the American Personnel and Guidance Association, Dallas, TX.
- LaFromboise, T. D., & Dauphinais, P. (1978, March). <u>Indian student perceptions of the counseling experience</u>. Paper presented at the meeting of the American Educational Research Association, Toronto, Canada.
- LaFromboise, T. D. (1979, April). Why assertion training with American Indians? Paper presented at the meeting of the American Personnel and Guidance Association, Las Vegas, NV.

- LaFromboise, T. D. (1979, July). Issues in counseling American Indians. In M. L. Fennel (Chair), <u>Barriers to cross-cultural counseling</u>. Symposium conducted at St. Joseph's College Hartford, CT.
- LaFromboise, T. D. (1980, March). <u>Cross-cultural counseling: Illustrated barriers and recommendations</u>. Paper presented at the meeting of the American Personnel and Guidance Association, Atlanta, GA.
- LaFromboise, T. D. & Kerr, B. (1980, April). <u>Career development with special populations</u>. Paper presented at the meeting of the Nebraska Personnel and Guidance Association, Lincoln, NE.
- LaFromboise, T. D. & Dixon, D. (1980, April). American Indian perceptions of trustworthiness in a counseling interview. Paper presented at the meeting of the American Educational Research Association, Boston, MA.
- LaFromboise, T. D. (1980, September). <u>Culturally relevant training for American Indian educational researchers</u>. Paper presented at the meeting of the American Psychological Association, Montreal, Canada.
- LaFromboise, T. D. (1980, October). The assertion of Indian rights and responsibilities.

 Workshop presented at the meeting of the National Indian Education Association, Dallas, TX.
- LaFromboise, T. D. (1980, October). <u>Culturally relevant training and curriculum integration: A reform with reservations</u>. Keynote address presented at the meeting of the Midwest Regional conference of the National Association of Interdisciplinary Ethnic Studies, Ames, IA.
- LaFromboise, T. D. (1981, April). Counseling with American Indians: Issues in training assertiveness and coping skills. In W. Rowe (Chair), Counseling American Indians: Review, research, and reactions. Symposium presented at the meeting of the American Educational Research Association, Los Angeles, CA.
- LaFromboise, T. D. (1981, April). American Indian world views and social influence. In C. Vontress (Chair), Existential approaches to cross-cultural counseling. Symposium conducted at the meeting of the American Personnel and Guidance Association, Atlanta, GA.
- LaFromboise, T. D. (1981, August). Cultural adaptation of the skills training model: Assertion training with American Indians. In J. W. Pine (Chair), <u>Cultural dimensions of counseling the American Indian</u>. Symposium conducted at the meeting of the American Psychological Association, Los Angeles, CA.
- LaFromboise, T. D. & Hampton, E. (1981, November). <u>Healing and behaviorism: Cultures in conflict</u>. Paper presented at the American Psychological Association conference on Psychotherapy with American Minorities, Boston, MA.

- LaFromboise, T. D. (1981, November). <u>Culturally biased testing</u> <u>of Indian children</u>. Speech presented to the American Indian caucus at the meeting of the National Association for the Education of Young Children, Detroit, MI.
- LaFromboise, T. D. (1982, March). Assessment of American Indian assertiveness: Undoing the myth of the passive Indian. Paper presented at the meeting of the American Educational Research Association, New York, NY.
- LaFromboise, T. D. (1981, July). <u>Critical issues in the professionalization of American Indian</u> women. Paper presented at the OHOYO Leadership conference, Seattle, WA.
- LaFromboise, T. D. (1983, April). Academic retention of Indian/Alaskan Native students. In G. Noley (Chair), The impact evaluation of Title IV, Part A of the Indian Education Act: A review of findings and implications. Symposium conducted at the meeting of the American Educational Research Association, Montreal, Canada.
- Kumar, K., LaFromboise, T., & Goh, D. (1983, April). A survey of minority membership in AFRA. Report presented by the Committee on the Role and Status of Minorities in Research and Development at the meeting of the American Educational Research Association, Montreal, Canada.
- LaFromboise, T. D. (1984, April). <u>Cross-cultural counseling: Encapsulation or entrapment?</u>
 Division E invited informal discussion at the meeting of the American Educational Research Association, New Orleans, LA.
- LaFromboise, T. D. (1984, April). Cultural strengths and stressors of gifted American Indian women. In L. Gray (Chair), Equity for women and minorities: A dialogue on the issues. Symposium conducted at the meeting of the American Educational Research Association, New Orleans, LA.
- LaFromboise, T. D. (1984, April). Critic. In Y. Takei (Chair), <u>Firewater and Indians:</u>

 <u>Abstinence and drinking among family members in four Indian communities</u>. Symposium conducted at the meeting of the American Educational Research Association, New Orleans, LA.
- LaFromboise, T. (1985, April). Discussant. Minority participation in the 1984 AERA annual meeting. Invited symposium conducted at the meeting of the American Educational Research Association, Chicago, IL.
- LaFromboise, T. (1985, April). Effects of race and communication style on American Indian perceptions of counselor impact and effectiveness. Invited symposium conducted at the meeting of the American Educational Research Association, Chicago, IL.
- LaFromboise, T. (1985, April). Commentator. In D. Scott-Jones (Chair), Minority perspectives on feminism and on gender and race as variables in research. Symposium conducted at the meeting of the American Educational Research Association, Chicago, IL.

- LaFromboise, T., & Foster, S. (1985, August). Cross-cultural counseling training from an American Indian perspective. In D. Atkinson (Chair), <u>Cross-cultural perspectives in counseling psychology</u>. Symposium conducted at the meeting of the American Psychological Association, Los Angeles, CA.
- LaFromboise, T. (1985, August). <u>Issues affecting ethnic minority psychologists</u>. Open forum of the Board of Ethnic Minority Affairs conducted at the meeting of the American Psychological Association, Los Angeles, CA.
- LaFromboise, T., & Wong, H. (1985, August). Ethnic minority content in the training of psychologists as providers. Continuing education workshop conducted at the meeting of the American Psychological Association, Los Angeles, CA.
- Hernandez, A., & LaFromboise, T. (1985, August). The development of the cross-cultural counseling inventory. Paper presented at the meeting of the American Psychological Association, Los Angeles, CA.
- Claiborn, C., Pamoles, J., & LaFromboise, T. (1985, August). Black students' racial identity and white counselors' cultural sensitivity. Paper presented at the meeting of the American Psychological Association, Los Angeles, CA.
- Rowe, W., Davis, B., & LaFromboise, T. (1985, August). <u>Verbal response patterns of effective American Indian helpers</u>. Paper presented at the meeting of the American Psychological Association, Los Angeles, CA.
- LaFromboise, T. (1986, June). <u>Bicultural competence for the self-determination of American Indians</u>. Keynote speech presented at the McDaniels Conference, Stanford, CA.
- LaFromboise, T. D. (1986, August). (Chair). <u>Issues affecting ethnic minority psychologists</u>. Open forum of the Board of Ethnic Minority Affairs at the meeting of the American Psychological Association, Washington, DC.
- LaFromboise, T. D. (1986, August). An American Indian perspective on culture-related requirements of APA's Ethical Principles. In P. Pedersen (Chair), Meeting the culture related requirements of the American Psychological Association's Ethical Principles. Roundtable presented for the Committee on International Relations in Psychology at the meeting of the American Psychological Association, Washington, DC.
- LaFromboise, T. D. (1986, August). (Chair). <u>Legislative issues affecting ethnic minorities</u>. Conversation hour at the meeting of the American Psychological Association, Washington, DC.
- LaFromboise, T. (1986, November). The professional identity of ethnic minority women: Self-defined or institutionally imposed. Jing Lyman Lecture, Institute for Research on Women and Gender, Stanford University, Stanford. CA.

- LaFromboise, T. (1986, November). Fostering the strength of Indian women in academia. Workshop conducted at the meeting of the National Indian Counselor's Association Conference, Reno, NV.
- LaFromboise, T. (1987, April). Self-efficacy of American Indian and Anglo American university women. Paper presented at the meeting of the American Educational Research Association, Washington, DC.
- LaFromboise, T. (1987, April). Chair. <u>Culture and curriculum</u>. Symposium conducted at the meeting of the American Educational Research Association, Washington, DC.
- LaFromboise, T. D., & Foster, S. (1987, April). <u>Cross-cultural training: Scientist-practitioner model and methods</u>. Paper presented at the Third National Conference for Counseling Psychology, Division 17 of the American Psychological Association, Atlanta, GA.
- LaFromboise, T. D. (1987, July). Fostering the strength of Indian women. Paper presented a the Gender and Equity for Student Achievement Annual Conference, Long Beach, CA.
- LaFromboise, T. D. (1987, August). Discussant. In B. Corenblum (Chair), <u>Development of self-identify in Indian children:</u> <u>Applied and theoretical approaches</u>. Symposium conducted at the meeting of the American Psychological Association, New York, NY.
- Wong, H., Comas-Diaz, L., Kennedy, C., LaFromboise, T., & Miyahira, S. (1987, August).

 <u>Psychotherapy with ethnic minority clients: Cross-cultural communications and understanding.</u>

 Continuing education workshop conducted at the meeting of the American Psychological Association, New York, NY.
- LaFromboise, T. (1988, February). Retention of American Indian engineering students. In W. Shilling (Chair), Retention of minority students in engineering. Panel conducted at the meeting of the National Association of Minority Engineering Program Administrators, San Diego, CA.
- LaFromboise, T., & Pine, C. (1988, March). Competence and countertransference in cross-cultural practice: American Indian session. Workshop conducted with the Los Angeles Society of Clinical Psychologists, Los Angeles, CA.
- LaFromboise, T. (1988, March). <u>Providing culturally relevant services to American Indians and Native Alaskans</u>. Panel discussion and break-out session at the First Annual Conference on Inter-Cultural Psychology, The Chicago School of Professional Psychology, Chicago, IL.
- Belgarde, M., & LaFromboise, T. (1988, April). Zuni adolescent suicide prevention project. In K. Swisher (Chair), Sociocultural parameters affecting program development in American Indian/Alaskan Native Schools. Symposium conducted at the meeting of the American Educational Research Association, New Orleans, LA.

- LaFromboise, T. (1988, June). <u>Cultural and cognitive considerations in the achievement of American Indian women university students</u>. Invited paper presented at the American Indian Educational Research Conference, University of Oklahoma, Norman, OK.
- LaFromboise, T. (1988, August). Barriers and facilitators in the achievement of American Indian women. In R. True (Chair), <u>Barriers and facilitators in the achievement of ethnic women of color</u>. Invited symposium at the meeting of the American Psychological Association, Atlanta, GA.
- LaFromboise, T. (1988, October). Minority scholars as servants of their people. Keynote speech for the Ford Foundation Fellowship Program Conference, National Research Council, Washington, DC.
- LaFromboise, T. (1986, November). Chair and discussant. <u>School-community linkages</u>. Session conducted at the Stanford University Centennial Conference on Accelerating the Education of At-Risk Students, Stanford, CA.
- LaFromboise, T. (1988, December). <u>Culture and coping in the professionalization of American Indian women.</u> Colloquium presented in the School of Justice Studies, University of Arizona, Tempe, AZ.
- LaFromboise, T. (1989, March). Fostering the strengths of American Indians in academia.

 Colloquium presented in the School of Education, Michigan State University, East Lansing, MI.
- Padilla, A., LaFromboise, T., Bagby, R., & Lindholm, C. (1989, April). <u>Cultural diversity in California</u>. Panel session presented to the California State Library Development Services Bureau, Stanford, CA.
- LaFromboise, T., & Lewis, H. (1989, May). Zuni adolescent suicide prevention curriculum. Workshop presented at Encircling Our Forgotten: A Conference on Mental Health Issues for the Emotionally Disturbed North American Indian Child and Adolescent, Oklahoma City, OK.
- LaFromboise, T. (1989, August). Development and use of the Cross-Cultural Counseling Inventory. In R. Bingham & J. Carter (Co-Chairs), Multicultural issues in counseling psychology and issues in private practice. Roundtable discussion at the meeting of the American Psychological Association, New Orleans, LA.
- LaFromboise, T. (1989, August). Chair. Mental health issues of American Indian women. Symposium conducted at the meeting of the American Psychological Association, New Orleans, LA.
- LaFromboise, T. (1989, August). Discussant. In B. Fretz (Chair), <u>Strategies for curriculum and resource development for culturally diverse competencies</u>. Symposium conducted at the meeting of the American Psychological Association, New Orleans, LA.

- LaFromboise, T. (1989, October). <u>Indian educators as servants of the people</u>. Keynote speech for the Wisconsin Indian Education Conference, Rhinelander, WI.
- LaFromboise, T. (1989, October). Changing and diverse roles of women in American Indian cultures. Colloquium for the Women's Studies Program, University of Wisconsin, Madison, WI.
- LaFromboise, T. (1990, April). Moderator of panel with J. Stiff Arm, S. Duggan, K. Blaeser, & R. Hill-Whiteman. The lives of American Indian women in art and reality. Celebrating the Lives of Indian Women Conference, University of Wisconsin, Madison, WI.
- LaFromboise, T. (1990, September). An exchange of gifts. Keynote speech for the 37th Annual Counseling Conference, University of Wisconsin, Whitewater, WI.
- LaFromboise, T., & Howard-Pitney, B. (1990, October). Zuni Life Skills Development: A pilot program. Paper presented at the American Indian/Alaska Native Adolescent Suicide Research Conference, Estes Park, CO.
- LaFromboise, T. (1991, January). Appreciating diversity. Faculty inservice for Nicolet Area Technical College, Rhinelander, WI.
- LaFromboise, T. D. (1991, February). Changing roles and diversity of contemporary American Indian women. Martin Luther King Day Seminar. Department of Microbiology and Immunology. University of Michigan Medical School, Ann Arbor, MI.
- LaFromboise, T.D. (1991, August). Chair and organizer. Social skills training with American-Indian adolescents: Application and retrospective analysis. Symposium conducted at the meeting of the American Psychological Association, San Francisco, CA.
- LaFromboise, T.D. (1991, August). <u>In obligation to our people</u>: <u>Giving merit to individual and cultural differences</u>. Division 45 presidential address presented at the meeting of the American Psychological Association, San Francisco, CA.
- LaFromboise, T.D., with Byers, S. R., Coleman, L., Lewis, M., Olmedo, E., Padilla, A.M., & Suinn, R.M. (1991, August). Can psychology be general without being diverse? Invited panel at the meeting of the American Psychological Association, San Francisco, CA.
- LaFromboise, T. D. (1991, August). Representing Division 45 and the Society of Indian Psychologists, with presidents of the Association of Black Psychologists, the National Hispanic Psychological Association, and the Asian American Psychological Association (1991, August). Conversations with minority psychological association presidents. Division 45 Conference for the Empowerment and Leadership Development of Ethnic Minorities, San Francisco, CA.
- LaFromboise, T. D. (1991, August). Speaker. <u>Zuni life skills</u> <u>development</u>. Indian Health Service Conference on The Primary Prevention of Psychosocial Problems of Native American Children, Scottsdale, AZ.

- LaFromboise, T. (1992, February). Zuni Life Skills Development Curriculum. Colloquium, School of Family Resources and Consumer Services, University of Wisconsin, Madison, WI.
- Coleman, H., LaFromboise, T., & Saner, H. (1992, April). <u>Bicultural efficacy and college</u>
 <u>adjustment.</u> Paper presented at the meeting of the American Educational Research Association,
 San Francisco, CA.
- LaFromboise, T. D. (1992, August). Speaker. <u>American Indian life skills development</u>. Indian Health Service Conference on Primary Prevention of Psychosocial Problems of Native American Children, Tempe, AZ.
- Vasquez-Nuttell, E., & LaFromboise, T. (1992, August). <u>Cross-cultural counseling competencies</u>. Symposium conducted at the American Psychological Association, Washington, DC.
- LaFromboise, T. D. (1992, August). An American Indian perspective. Invited Division 45 Symposium: History of Psychology The Untold Story conducted at the meeting of the American Psychological Association, Washington, DC.
- Bee Gates, D. J., Howard Pitney, B. A., & LaFromboise, T.(1992, August). <u>Help-seeking behavior in American-Indian high school students</u>. Paper presented at the meeting of the American Psychological Association, Washington, DC.
- LaFromboise, T. D. (1992, August). <u>Educating Indian students for bicultural competence</u>. Invited SPSSI Symposium: Quality of Education for Ethnic Minority Students of the meeting of the American Psychological Association, Washington, DC.
- LaFromboise, T.D. (1992, November). Clinical information on American Indian women and youth. Colloquium for the Department of Psychology, Oklahoma State University, Tulsa, OK.
- LaFromboise, T.D. (1993, July). Facing the future with hope. Moderator of youth panel: Healing our hearts and celebrating our strengths. Great Lakes Inter-Tribal Council, The Mothers, Grandmothers, Aunts, and Sisters Program annual inter-tribal women's gathering, Tomahawk, WI.
- LaFromboise, T.D. (1993, September). <u>Assessment of American Indian life skills</u>. Paper presented at the Ninth Buros-Nebraska Symposium on Measurement and Testing: Multicultural Assessment, Lincoln, NE.
- LaFromboise, T.D. (1994, March). Gifts and burdens of culture in psychotherapy with American Indian women. Invited address at the Michigan State University Multi-Ethnic Counseling Center Alliance 25th Anniversary Conference, Lansing, MI.

- LaFromboise, T.D. (1994, April). <u>American Indian life skills</u> <u>development</u>. Presentation at the Wisconsin Indian Education Association Conference, Madison, WI.
- LaFromboise, T.D. (1994, October). Wisdom and power of the medicine wheel: Transcendent directions in mental health services. Keynote speech for the Chicago School of Professional Psychology Cultural Impact Conference, Chicago, IL.
- LaFromboise, T.D. (1994, November). Social skills intervention for bicultural competence of Native American youth. Colloquium presented in the Department of Psychology. California State University, Los Angeles.
- LaFromboise, T.D. (1995, February). <u>Individual and group counseling interventions with Native American Indians</u>. Colloquium series presented in the Department of Counseling, University of North Dakota, Grand Forks, N.D.
- LaFromboise T.D. (1995, February). The power of the spoken word: Counseling process with American Indians. Colloquium presented in the Department of Counseling, San Francisco State University, San Francisco.
- LaFromboise, T.D. (1995, February). Emic/etic trends in psychotherapy with ethnic minorities. Lecture presented in the Internship Seminar, Department of Veterans Affairs Medical Center, Palo Alto, CA.
- LaFromboise, T.D. (1995, April). Clinical practice with Native American Indian youth. Lecture in the School of Social Welfare, University of California, Berkeley, CA.
- LaFromboise, T.D. (1995, April). American Indian life skills development for suicide prevention. Workshops presented at the National Indian Child Welfare Conference, Minneapolis, MN.
- LaFromboise, T.D. (1995, September). Counseling process with Native American Indians.

 Colloquium presented in the Counseling Psychology Program, University of San Francisco, San Francisco, CA.
- LaFromboise, T.D. (1995, October). <u>Counseling intervention and American Indian tradition</u>. Lecture presented in Classes Without Quizzes!, 1995 Stanford Reunion Homecoming Weekend, Stanford, CA.
- LaFromboise, T. (1995, October). American Indian life skills development for suicide prevention. Workshop presented at the National American Indian Education Association Conference, Tuscon, AZ.

CONSULTATION/COMMITTEES

Consultant to various Native Indian projects and agencies in Canada and the United States including: Alaska, Arizona, California, Colorado, Indiana, Illinois, Massachusetts, Michigan,

Minnesota, Nebraska, New Mexico, New York, North Dakota, Oklahoma, Oregon, South Dakota, Virginia, Wisconsin, Washington, Washington, DC., and Wyoming. A list of sixty consultancies from 1976 to 1995 is available.

Chair, Advisory Board, Lincoln Indian Center 1982-83.

California State Personnel Board, Script Consultant and Actor in Educational Videotape on Foreign Accent Sensitivity Training, "Working Together", Sacramento, 1986.

Advisory Board, California School of Professional Psychology Multicultural Curriculum Development Project, 1986.

Advisory Board, Chicago School of Professional Psychology, 1988-90.

Advisory Board, U. S. Congress, Office of Technology Assessment, Adolescent Health Report, 1988-90.

Chair, Advisory Committee, U. S. Congress, Office of Technology Assessment, American Indian Youth Mental Health Report, 1988.

Advisory Board, Yale University Higher Education Extension Service, 1989.

Teacher Training and Curriculum Development, Suicide Prevention, Zuni Public Schools, 1986-1991.

Recruitment of American Indian Students into Psychology, Colorado State University, Psychology Department, 1990.

Testimony, U.S. House of Representatives Committee on Interior and Insular Affairs on S. 1270, An Act to Provide an Indian Mental Health Demonstration Grant Program, March, 1990.

Review Panel, National Institute of Mental Health, Minority Research Center Grant Proposals, March, 1990. Interviewee, P. Zimbardo (Producer). <u>Discovering Psychology Television Series</u>. Stanford University, 1990.

Rural Health Task Force, University of Wisconsin-Madison, Office of the Vice Chancellor for Health Sciences, 1991.

Project Advisory Committee, Wisconsin Indian Network for Genetics Services, 1991.

Counselor Training and Curriculum Development, Indian Modeling Therapy Project, Turtle Mountain Chippewa Tribe, 1991.

Teacher Training and Curriculum Development, Suicide Prevention, Cherokee Nation, 1991.

Madison Indian Parent Committee, Educational Resources Project for Native American Students in the Madison Metropolitan School District (Title IV, Part A), 1991-1992.

Participant, Indian Health Service Roundtable Conference on Dysfunctional Behavior and its Impact on Indian Health, December, 1991.

Advisory Board, Wisconsin Indian Network for Genetics Services, 1990-present.

Member, University of Wisconsin Indian Health Planning Work Group, 1992.

Clinician Training, Issues of Cross-Cultural Counseling, Swedish American Hospital, Rockford, IL, 1992.

Consultant for the Indian Health Service Evaluation of IHS funded Adolescent Regional Treatment Centers, 1995-1997.

Member, Technical Expert Group, Female Adolescents, Center for Substance Abuse Prevention and the National Women's Resource Center, 1995-1997.

VIDEOTAPES

Interviewee, R. Swinn (Producer). <u>Minority Role Models</u> - <u>Teresa LaFromboise</u>. Colorado State University, 1992.

Interviewee, L. Walsh (Producer). Native American Education: Strategies for Change. The Whole Child (Program 6 of 6). KNME TV 5 and the New Mexico Department of Education, 1994.

Lecture, A. Ivey (Producer). <u>Counseling Native American Indians</u>. Distributed by Microtraining Associates, Inc., Amherst, MA.

REVIEWER FOR SCHOLARLY JOURNALS AND PUBLISHERS

American Indian and Alaska Native Mental Health

Research Journal, 1987 - present

Educational Researcher, 1984, 1988

Journal of Counseling and Development, 1990, 1991

Journal of Counseling Psychology, 1986

Journal of Consulting and Clinical Psychology, 1989

Journal of the National Center for American Indian and Alaska Native Mental Health Research,
1995

Journal of Pediatric Psychology, 1985

Journal of Personality and Social Psychology, 1984, 1996

Psychology of Women Quarterly, Consulting Editor, 1986-1988

Sex Roles, 1994, 1995

Signs: Journal of Women in Culture and Society, 1994, 1995

The Counseling Psychologist, 1988

Wm. C. Brown Publishers, 1990 - present

EDITORIAL BOARDS

American Indian Culture and Research Journal, 1987-1990

Cultural Diversity and Mental Health, 1995

Multicultural Aspects of Counseling Series, Sage Publications, 1990-1991

Professional Psychology: Research and Practice, 1981-1984, 1994-1997

Racial and Ethnic Minority Psychology Series, Sage Publications, 1995-1998

PROFESSIONAL ORGANIZATIONS

American Educational Research Association

American Indian Alaskan Native Education SIG (Chair, 1984)

Division E -- Affirmative Action Committee (Co-Chair, 1986; Chair, 1987), Membership

Committee (Member 1986-87), Program Reviewer (1984-85)

Standing Committee on Role and Status of Minorities in Research and Development (Member, 1982-1985)

American Psychological Association

Accreditation Site Visitor

Board for the Advancement of Psychology in the Public Interest (Member, 1991-1993)

Board of Ethnic Minority Affairs (Chair, 1986; Member 1983-1986)

Committee on Structure and Function of the Council of Representative (Member, 1996-1999)

Task Force on Education and Training (Member, 1983-1985)

Board of Professional Affairs (Liaison, 1985-1986)

Division 15 (Member, Minority Committee, 1984-1985)

Division 29 Task Force on American Indian Mental Health (Co-Chair, 1990)

Division 17 (Member, Membership Committee 1985-1988; Cross-Cultural Competence Committee, 1989-1990)

Division 35 (Member, Native American Women Task Force 1984-present)

Minority Fellowship Program Advisory Board (Member, 1981-1983)

Division 45 (Past-President, 1991-1993; President, 1990-1991; Member-at-Large, 1987-1989; Representative to Council, 1993-1995).

California State Psychological Association Ad Hoc Committee on Multi-Ethnic Diversity (Member, 1989-90)

National Indian Education Association

National Counselors Association (Vice-Chair, 1984)

Society of Indian Psychologists (President, 1986-1988; Vice- President, 1983-1985; Secretary, 1981-1982; Executive Committee Member, 1988-1991; Member, 1981-present)

National Indian Child Welfare Association, 1995.

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PILLSBURY CENTER SOUTH
220 SOUTH SIXTH STREET

MINNEAPOLIS, MINNESOTA 55402-1498

TELEPHONE: (612) 340-2600

FAX: (612) 340-2868

December 5, 1996

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GREAT FALLS

VIA FEDERAL EXPRESS

Teresa D. LaFromboise 1515 Alameda de Las Pulgas San Carlos, CA 94070

Re:

Harjo et al. v. Pro-Football, Inc.

Dear Professor LaFromboise:

Enclosed please find a copy of your expert report in the above-referenced matter. Please let us know if you have any questions or require anything further.

Very truly yours,

Laurie Scanlon

Legal Assistant 612/340-2637

LS/kk Enclosure

cc:

Michael Lindsay, Esq. Stephen Baird, Esq.



Expert Report for Theresa D. LaFromboise

I. Background and Qualifications

A. Theresa LaFromboise is Associate Professor of Counseling

Psychology at Stanford University. She is the authorized publications and has served as in the University. in the United States and Canada. A copy of her curriculum vitae is 'E attached.

B. Professor LaFromboise is expected to testify regarding the psychological and cultural challenges facing Native Americans, especially Native American youth, the psychological harm that results from the disrespectful use of Native American cultural symbols by the dominant culture, and the psychological impact on Native Americans of the use of the term "Redskins" as the name of a professional football team.

II. Opinions that Professor LaFromboise is Expected to Offer, and the Basis for those Opinions

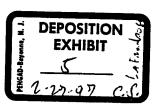
- A. Professor LaFromboise will describe generally the field of Counseling Psychology. This field is oriented toward treating individual psychological problems through interaction with a therapist, and the cultural backgrounds of the patient and therapist are critical to that relationship
- 1. Factors that affect patients' and therapists' psychological profile background, among others.

 2. The Success of the Therapist-Patient Relationship Hinges Upon Communication Between the Therapist and the Patient

 a) Successful communication requires that the therapist understand how the patient perceives the world her

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in the world, and her modes of interaction with others

- b) Successful communication requires that that therapist understand how the therapist's own appearance and behavior may influence the patient.
- c) Successful communication requires that the therapist understand her own perspectives and biases in interpreting the actions of the patient
- 3. Professor LaFromboise has specialized in the study of culture as a factor in the patient-therapist relationship, particularly the interaction between Native American cultures and Euro-American culture.
- B. Professor LaFromboise is expected to testify that the study of cultures within the field of counseling psychology distinguishes between "dominant cultures" and "minority cultures"
 - 1. A "dominant culture" is defined as a culture that has successfully structured society around its institutions, norms, beliefs, and modes of thought and behavior. This may include forcing minority cultures to conform to its norms.
 - 2. A "minority culture" is defined as culture that exists as an identifiable subgroup with its own norms, beliefs, and modes of thought and behavior, but whose members must accommodate and adapt to the dominant culture in order to function in society.
- C Professor LaFromboise is expected to testify that Native Americans form a minority culture within the dominant "Euro-American" culture of the United States
 - 1. Although there are many diverse Native American cultures, all share aboriginal roots and radical transformation by contact with Euro-American culture

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- a) Native American culture is a "minority culture" in the United States not only because Native Americans are numerically fewer, but because Native American lands, peoples, and customs have been destroyed, assimilated, and transformed by Euro-American culture, often by force
- 2. Euro-American culture is the "dominant culture" because Euro-American laws, customs, and ways of thinking form the core of most legal and social institutions in the United States, and these have been imposed on minority cultures.
 - a) Native Americans have been largely denied rights of self-determination
 - (1) Congress has supreme authority over Native Americans
 - (2) Congress has frequently and radically shifted policies toward Native Americans. For example:
 - (a) BIA interference
 - (b) Treaty abrogations
 - (c) Interference in tribal elections
 - (d) Policies in succession promoting separation, assimilation, allotment, termination, and re-organization
 - b) Native Americans have been denied the right to practice many traditional customs and religious practices through, for example:
 - (1) Restrictions on use of animal products (e.g. eagle feathers)

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(2) Restrictions on access to sacred lands

- D. Professor LaFromboise is expected to testify that psychological health for Native Americans is facilitated by "Bi-cultural Competence," defined as familiarity and ability to function in both Euro-American and Native American modes. This is because most Native Americans face dual-cultural demands.
 - 1. Native Americans must understand and be able to communicate in the forms of Euro-American culture, because those forms are dominant in the United States CURFICULAR
 - a) Failure to function in Euro-American culture greatly restricts Native Americans' economic, professional, and social opportunities.
 - IN SPORTS 2. Native Americans who abandon or fail to participate in Native American culture pay a high social and psychological price
 - a) Euro-American culture does not accept Native Americans as equal participants
 - b) Participation in their heritage provides Native Americans with a source of psychological support
- E Professor LaFromboise is expected to testify that conflicts between the dominant and minority cultures place great psychological strain on members of the minority culture that seek Bi-Cultural competence

1. When the dominant and minority cultures come into conflict members of the minority culture may be forced to choose sides or suppress their cultural identities and loyalties. This is referred to as "antagonistic acculturation."

OR ONLY INTERACT DOMINANT CULTURE
WHEN NECESSARY June 10, 1996 Page 4 of 10

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PUNITION OF INDIAN SMOKE

- a) If the minority member conforms to the norms of the dominant culture by abandoning or suppressing her native culture, she may suffer psychological harm.
- b) If the minority member conforms to the norms of the minority culture, and rejects or suppresses the norms of the dominant culture, she may feel and be treated as an outcast by the dominant group, with severe economic, social, and psychological consequences.
- 2. The effects of antagonistic acculturation vary by individual
 - a) Resilient, highly functioning individuals can cope, but suffer ongoing psychological stress
 - b) More vulnerable individuals may be left in a psychological "no-man's land," resulting in observable outward effects, including:
 - (1) Depression
 - (2) Alcoholism
 - (3) Suicide
 - (4) Family abuse
 - (5) Anti-social behavior
- F. Professor LaFromboise is expected to testify that the use of the symbols of a minority culture by the dominant culture communicates messages to the minority culture
 - 1. The fact of the use communicates messages

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- a) If the dominant culture uses the symbols with the permission or participation of representatives of the minority culture, the fact of the use may provide psychological strength or affirmation to members the minority culture
- b) If the dominant culture appropriates the symbols without the permission or participation of representatives of the minority culture, the fact of appropriation emphasizes the powerlessness of the minority culture
 - (1) Here, the football team persists in the use of "Redskins" despite clear and well-publicized protests
- 2. The form of the use communicates messages
 - a) If the form of the use is positive or associates the minority culture with positive qualities, this communicates a positive message to members of the dominant and minority cultures
 - b) If the form of the use communicates a negative message or associates the minority culture with negative qualities, this communicates a negative message to members of the dominant and minority cultures.
 - (1) Use of "Redskins" by the Washington football team highlights a "romanticized" view of Native Americans, i.e, that they are a savage war-like people, suitable for invoking fear in one's opponents.
- G Professor LaFromboise is expected to testify that the history of the relationship between Native American and Euro-American culture is marked by oppression of Native American Cultures by Euro-American culture

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- 1. Euro-American culture has historically viewed Native American culture as having little worth
- 2. Euro-American culture has historically ignored important aspects of Native American life and culture
 - a) Euro-American culture has devoted almost no effort to understanding the role of women in Native American Society
 - (1) There is widespread ignorance, for example, that the Iroquois and other tribes were matriarchal societies (the Iroquois Great Law of Peace was an equal rights statute for men)
 - b) There is widespread ignorance of the consensus-based decisionmaking of most Native American societies
- 3. Euro-American culture has historically distorted or caricatured other aspects of Native American life and culture
 - a) Euro-American culture has historically exaggerated Native Americans' propensity for warfare and behavior during war
 - b) Euro-American culture portrays Native American women in limited forms
- H. Professor LaFromboise is expected to testify that this history of conflict and oppression means that most Native Americans take very seriously the messages communicated by Euro-American culture.
- I. Professor LaFromboise is expected to testify that Euro-American dominance over and hostility toward Native American cultures is recognized as a causal factor in numerous widespread Native American psychological problems:

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- 1. Low academic achievement
- 2. Anger at self, others
- 3. Depression
- 4. Alcoholism
- 5. Suicide
- 6. Family Abuse
- J. Professor LaFromboise is expected to testify that the term "Redskin(s)" is widely recognized among Native Americans as a disparaging term for Native Americans
 - 1. As a person of Native American descent, Dr. LaFromboise will testify that she has always understood the term "Redskin(s)" to be a disparaging term for Native Americans.
 - 2. As a scholar who specializes in the study of Native American psychology, Dr. LaFromboise has had broad contact with Native Americans throughout the United States and exposure to the literature of Native American psychology
 - a) With rare exceptions, the term "Redskin(s)" is consistently used by the Indian students that she has worked with as a disparaging term for Native Americans.
 - b) Dr. LaFromboise has never written a scholarly manuscript, and is not aware of scholarly manuscripts written by others, that refer to Native Americans as "Redskin(s)" except to draw attention to the disparaging character of the term.

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- 3. The results of the Ross Survey are consistent with this conclusion.
- K Professor LaFromboise is expected to testify that the use of the term "redskins" as the name of a professional football team is psychologically harmful to many Native Americans, particularly children
 - 1. For those who know what the term "Redskin(s)" has meant, its use communicates the following messages, contributing to the effects noted above
 - a) It emphasizes the powerlessness of Native Americans
 - b) It trivializes Native American history
 - c) It insults their culture
 - d) It communicates that they belong to a worthless people, notable only for their ferocity
- 1
- e) It forces a choice between the team/participation in the sport/enjoyment of professional football and their culture
- X
- 2. For those who do not know what it means, the term nonetheless creates the future possibility of psychological dissonance
 - a) As children later learn of the term's disparaging meaning, they are forced to choose between their enjoyment of football and their dislike of the name, or to suppress their opinions to conform, with the effects noted above

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III. Documents on Which Professor LaFromboise's Opinions Will be Based

Professor LaFromboise will base her opinion on various scholarly publications, her clinincal experiences, and her own researches in the field.

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Theresa D. LaFromboise Disclosure

June 10, 1996 Page 10 of 10

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PILLSBURY CENTER SOUTH
220 SOUTH SIXTH STREET
MINNEAPOLIS, MINNESOTA 55402-1498
TELEPHONE: (612) 340-2600

FAX: (612) 340-2868

MICHAEL R. DRYSDALE (612) 340-5652

May 8, 1996

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Teresa D. LaFromboise, Ph.D. School of Education Stanford University Stanford, CA 94305-3096

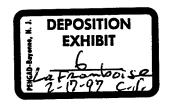
Dear Dr. LaFromboise:

Enclosed is a very rough draft of an outline of the expert testimony you might give. It reflects considerable wishful thinking on my part in connecting the use of the term "Redskins" to psychological harm to Native Americans. You should modify or qualify the opinion wherever appropriate. You may also be aware of helpful points that I have not thought of, and I encourage you to point them out to me. I would also like to employ whatever terms of art that you prefer (e.g. is "Anglo culture" the term you would use describe the dominant culture?), and I especially want to remove anything that's wrong, oversimplified, or insensitive. This opinion basically boils down to the conclusion that "The use of "Redskins" as the name for a professional football team is psychologically harmful to Native Americans." Anything that leads us to that conclusion belongs in the opinion; anything that leads us away from that opinion is worth noting or explaining. Thank you again for your help, and I look forward to talking with you tomorrow at 11:00 A.M. your time.

Very truly yours, Michael Imphile

Michael R. Drysdale

MRD:cam Enclosure(s)



Expert Report for Theresa D. LaFromboise

J. Background and Qualifications

TO.00 FAA 014 040 4000

- A. Theresa LaFromboise is Associate Professor of Counseling Psychology at Stanford University. She is the author of numerous publications and has served as a consultant for numerous agencies in the United States and Canada. Λ copy of her curriculum vitae is attached.
- B. Professor LaFromboise is expected to testify regarding the psychological and cultural challenges facing Native Americans, especially Native American youth, the psychological harm that results from the disrespectful use of Native American cultural symbols by the dominant culture, and the psychological impact on Native Americans of the use of the term "Redskins" as the name of a professional football team.

II. Opinions that Professor LaFromboise is Expected to Offer, and the Basis for those Opinions

- A. The Field of Counseling Psychology is Oriented Toward Treating Individual Psychological Problems Through Interaction with a Therapist, and the cultural backgrounds of the patient and therapist are critical to that relationship
 - 1. Factors that affect patients' and therapists' psychological profile include gender, wealth, age, appearance, health, and cultural background, among others.
 - 2. The Success of the Therapist-Patient Relationship Hinges Upon Communication Between the Therapist and the Patient
 - a) Successful communication requires that the therapist understand how the patient perceives the world, her place in the world, and her modes of interaction with others

 of Theresa D. LaFromboise May 8, 1996

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- b) Successful communication requires that that therapist understand how the therapist's own appearance and behavior may influence the patient.
- c) Successful communication requires that the therapist understand her own perspectives and biases in interpreting the actions of the patient
- 3. I have specialized in the study of culture as a factor in the patient-therapist relationship, particularly the interaction between Native American cultures and Anglo culture.
- B. The study of cultures within the field of counseling psychology distinguishes between "dominant cultures" and "minority cultures"
 - 1. A "dominant culture" is defined as a culture that has successfully structured society around its institutions, norms, beliefs, and modes of thought and behavior.
 - 2. A "minority culture" is defined as culture that exists as an identifiable subgroup with its own norms, beliefs, and modes of thought and behavior, but whose members must accommodate and adapt to the dominant culture in order to function in society.
- C Native Americans form a Minority Culture within the Dominant "Anglo" Culture of the United States
 - 1. Although there are many diverse Native American cultures, all share aboriginal roots and radical transformation by contact with Anglo culture.
 - a) Native American culture is a "minority culture" in the United States not only because Native Americans are numerically fewer, but because Native American lands,

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DONOLL & HELLINGI

- 2. Anglo culture is the "dominant culture" because Anglo laws, customs, and ways of thinking form the core of most legal and social institutions in the United States.
- D. Psychological Health for Native Americans is begandent on "Bi-cultural Competence" [Dr. LaFromboise: It wasn't clear to me whether bi-cultural competence is important for the therapist, individuals, or both. This section assumes that it is important for individuals.]

puth

- 1. Native Americans must understand and be able to communicate in the forms of Anglo culture, because those forms are dominant in the United States
- 2. Native Americans must understand and respect their Native American cultural heritage,
 - a) Anglo culture does not accept Native Americans as equal participants
 - b) Participation in their heritage provides Native Americans with sources of psychological support
- E. Conflicts Between the Dominant and Minority Cultures Place Great Psychological Strain on Members of the Minority Culture
 - 1. When the dominant and minority cultures come into conflict members of the minority culture may be forced to choose sides

She is usually more readily accepted but often dis

a) If the minority member conforms to the norms of the dominant culture, she may suffer psychological harm from abandoning her native culture

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- A-1 0 0 0
- b) If the minority member conforms to the norms of the minority culture, she may feel and be treated as an outcast by the dominant group
- 2. Attempts to reconcile the views of both cultures are psychologically demanding and may leave the individual feeling in a psychological "no-man's land"
- F. Use of the Symbols of a Minority Culture by the Dominant Culture Communicates Messages to the Minority Culture
 - 1. The Fact of the Use Communicates Messages
 - a) If the Dominant Culture uses the symbols with the Permission or Participation of Representatives of the Minority Culture, the Fact of the use may provide psychological strength or affirmation to members the minority culture
 - (1) Use of Seminole images and name by Florida State University?
 - b) If the dominant culture Appropriates the symbols without the Permission or Participation of Representatives of the Minority Culture, the fact of appropriation emphasizes the powerlessness of the minority culture
 - (1) Redskins
 - 2. The Form of the Use Communicates Messages
 - a) If the form of the use communicates a positive message or associates the minority culture with positive qualities, this provides psychological benefits to members of the minority culture

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G. The history of the relationship between Native American and Anglo cultures is marked by Oppression of Native American Cultures by Anglo Culture

- 1. Anglo culture has historically viewed Native American culture as having little worth
- 2. Anglo culture has historically ignored important aspects of

American life and culture

a) Anglo culture has devoted almost no effort to understanding the role of women in Native A Society

b) Anglo culture

b) Anglo culture

b) Anglo culture has devoted almost no effort to understanding the role of women in Native A Society understanding the role of women in Native American

b) ANGLO culture that must allow use of tradition series intil 19 18 India Religions Freedom ait - religion

3. Anglo culture has historically distorted or caricatured other aspects of Native American life and culture

a) Anglo culture has historically exaggerated Native Americans' propensity for warfare and behavior during war b) India work has been designated to be elthe prostututes in principal of Dominance Over and Hostility Toward Native American

H. Anglo Dominance Over and Hostility Toward Native American Cultures is Recognized as a Causal Factor in Numerous Widespread Native American Psychological Problems + Academic Arachevenut

1. Low Self-Esteem

a) The view that one belongs to a worthless people leads to the belief that one is oneself worthless

2. Depression - rate of Lynnson Draft Opinion of Theresa D. LaFromboisc Confidential Privileged Work Product Property of Dorsey & Whitney LLP

May 8, 1996

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- 3. Hopelessness
- 4. Alcoholism
- 5. Suicide Asserie Performence Claude Studies work
 6. [Dr. LaFromboise: I'm not suggesting that the Redskins cause dynesses
- 6. [Dr. LaFromboise: I'm not suggesting that the Redskins cause depositions of people to become alcoholics or commit suicide, but rather that the team name is one element among many that contributes to the psychological load on Native Americans. I also recognize that some of your research suggests that Native American youth have a more positive self-image than conventional wisdom suggests. We should talk about how that research might impact your perception of the issues. My goal is to provide a plausible connection between the use of term "Redskin(s)" and psychological distress for Native Americans, but I do not want to overstate the case.]
- I. The term "Redskin(s)" is Widely Recognized Among Native Americans as A Disparaging Term for Native Americans

1. As a Native American, I have always understood the term
"Redskin(s)" to be a disparaging term for Native Americans.

- As a scholar who specializes in the study of Native American
 psychology, I have had broad contact with Native Americans
 throughout the United States and exposure to the literature of
 Native American psychology
 - a) The term "Redskin(s)" is consistently used by the subjects
 of my studies as a disparaging term for Native Americans.

 and Policy studies of policy of the Staffed
 - (1) There are exceptions, but they are rare

b) I have never written or read a scholarly manuscript that referred to Native Americans as "Redskin(s)" except to draw May 8, 1996

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attention to the disparaging character of the term.

- J. The Use of the Term "Redskins" as the Name of a Professional Football Team is Psychologically Harmful to Many Native Americans, Particularly Children
 - 1. For those who know what the term "Redskin(s)" has meant, its use:
 - a) Emphasizes the powerlessness of Native Americans
 - b) Trivializes Native American history
 - c) Insults their culture

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d) Communicates that they belong to a worthless people, notable only for their ferocity

e) Forces a choice between the team/enjoyment of term use the professional football and their culture

2. For those that don't know what it means, the term nonetheless creates the future possibility of psychological dissonance

- a) As children later learn of the term's disparaging meaning, they are forced to choose between their enjoyment of football and their dislike of the name
 - (1) Daughter's experience with the high school team
- K [Dr. LaFromboise: I suspect there are also negative psychological consequences for non-Indians stemming from the use of terms like "Redskin(s)" for sports teams but I'm not aware of any literature on the subject.]

Three that Checked Staped Island was war whose as her Levelless for Calgalia partie, been up like

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III. Documents on Which Professor LaFromboise's Opinions Will be Based

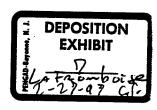
A. [Dr. LaFromboise: Think of what documents you would point to support the above contentions (for those contentions that make sense). They need not be your own work. It's fine if your opinion is based on personal experience, but it helps if there is published work as well. We do not need to supply page numbers. If you think certain works are helpful, but are not sure, I am happy to locate copies and go over them. In the case of general points, we need not provide exhaustive citations. As we get closer to the connection between the use of Native American "mascots" and psychological harms, the more documentation the better.]

touchstone articles of mine other references

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1977



redwood

reef1.2

Reef1 was originally till, and was horrowed from Middle Dutch vil. "ridge, ledge of rock." Reef2 is from Old Norse til, "a rib," hence also "reel in a sail"; it is probably related to reef 1.

ree!1-2-3

Reel¹ was Old English hreol. 'spool." Reel2 was Middle English relen, "to whirl around, stagger"; it is probably from reel1. Reel3, which first occurs in the sixteenth century, is probably also from reel1 or from reel2, since the dance involves much fast



reel1 Bait-casting reel

ă pat ă pay à care, à father/è pet/ ë bezi pitzi pie i fierce/ò pot/ ō go o paw, for oi oil ou book/ เพื่ boot ou out 'u cut / u fur/ th the th thin hw which zh vision/ a ago, item, pencil, atom, circus

Salvation from sin through Christ's sacrifice. red-hand-ed | red'han'did | adv. In the act of committing, or having just committed, a crime. red-head |red'hed'| n. A person with red hair. red-head-ed |red'hed'id| adj. Having red hair: a redheaded boy.

red herring. 1. A smoked herring having a reddish color. 2. Something used to draw attention away from the subject under notice or discussion.

red-hot | red hot | adj. 1. Hot enough to glow red: a red-hot bar of steel. 2. Heated, as with excitement or anger. 3. Informal. New; very recent: red-hot information.

red-o-lent |red'l ont | adj. 1. Having or giving off a pleasant odor; scented: redolent clusters of honeysuckle. 2. Reminiscent: a campaign redolent of machine politics. -red'o-lence n.

re-dou-ble |re dub'al| v. re-dou-bled, re-doubling. To make or become twice as great. re-doubt-a-ble |ri dou'to bol | adj. 1. Causing

awe or fear. 2. Worthy of respect or honor. re-dound |ri dound'| v. To have an effect, especially by bringing or reflecting credit or discredit.

red pepper. Cayenne pepper or a similar sharptasting seasoning. See pepper.
re-dress | ri dres' | v. To set right; remedy or

rectify (something considered wrong or unjust). -n. |re'dres'| or |ri dres'|. 1. The act of setting right; correction; remedy: a redress of a wrong. 2. Satisfaction or amends for wrong done.

Reds |redz|. The National League baseball

team from Cincinnati.

Red Sea. A sea between Africa and Arabia. connected with the Mediterranean Sea by the

red-skin | red'skin' | n. Informal. A North American Indian.

Red-skins | red'skinz' |. The National Football League team from Washington. Red Sox |söks|. The American League baseball

team from Boston. red-start | red'start' | n. A small bird with black

feathers and orange patches on the wings and tail. red tape. Procedures or practices, especially

those connected with the official business of a government, that require great attention to detail and often result in delay or inaction.

re-duce |rī doos' | or |-dyoos' | v. re-duced, reduc-ing. 1. To make or become less in amount, degree, size, rank, etc.; diminish: reduced their demands for wage increases; as the volume of noise gradually reduces. 2. To gain control of; conquer: a design to reduce them under absolute despotism. 3. To bring into a given condition or state: reduce marble to dust; reduce life to a dull routine. 4. a. To lower the valence of (an atom or element). b. To remove oxygen from chemical combination with or in (an element or compound). c. To change to a pure metallic state: smelt. 5. To change (a mathematical expression) into a simpler form without affecting its value or meaning. 6. To lose body weight, as by dieting. re-duc-tion | ri duk'shan | n. 1. The act or process of reducing. 2. The amount by which something is made smaller or less. 3. The first cell division in meiosis, in which the number of

chromosomes in the cell is reduced. 4. 7 changing of a fraction into a simpler for especially by dividing the numerator and . nominator by any integral factors that they h in common.

re-dun-dan-cy | rī dun'dən se | n. pl. re-d dan-cles. 1. The condition of being redund 2. A word or expression that unnecessarily peats an idea or meaning. For example, in sentence He did not know the answer, but he re his hand, however, the word "however" is a dundancy

re-dun-dant |ri dun'dent | adj. 1. Composec or containing more words than necessary: bose: repetitive: a redundant message. 2. la cess of the minimum necessary; extra: reduce machine parts. -re-dun'dant-ly adv.

red-winged blackbird | red'wingd' |. A bi bird with bright-red patches on the wings. Red Wings. The National Hockey League 6 from Detroit.

red-wood | red'wood' | n. 1. A very tall o bearing evergreen tree of northwestern Cal nia. It is the tallest kind of tree in the sometimes growing to a height of over 300, See sequola. 2. The soft but strong red brown wood of such a tree. —modifier a red forest; redwood picnic tables. [SEE PICTURE reed | red | n. 1. Any of several tall, stemmed grasses or similar plants that wet places. 2. a. A springy strip of cane of used in the mouthpiece of certain wind ments. It vibrates when air passes over causes the air in the instrument to vibrate similar strip of metal that causes the organ pipe to vibrate. c. A woodwind ment, such as an oboe or clarinet, played reed. d. An organ stop using pipes the reeds. -modifier: a reed basker; the reed ments of a band. These sound alike reed reed.y |rē'dē| adj. reed.lier, reed.liest. of reeds: a reedy marsh. 2. Resembling slim, reedy girl. 3. Having the high. breathy sound of a reed instrument: reedy tone. - reed'i-ness n. reef | ref | n. A strip or ridge of rock.

coral that rises to or close to the body of water. [SEE NOTE]

reef2 | ref | n. A portion of a sail tuck tied down so as to-decrease the area that is exposed to the wind. -v. Tok size of (a sail) by tying a reef. Sereek | rek | v. To give off a strong or odor: a salad reeking of garlic. unpleasant odor: the musty reek of lion. These sound alike rook, we reel' |rel| n. 1. A spoollike device the a central bar, used for winding a hose tape, fishing line, etc. 2. The amount reel. -v. 1. To wind onto a reel. (a fish) by winding on a reel: -phrasal verb. reel off. To recite NOTE & PICTURE | reel' | rel | v. 1. To stagger: To

smoky room, half-suffocated 2. To round in a whirling motion: The reeled in his mind. [SEE NOTE]
reeled | rel | n. 1. Any of several feel dances. 2. Music written to accou

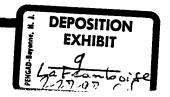
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1975



re-dec o-rate, re-dekto-rate, o.t., v.i.—redecrorate, redecrorate, redecrorate, To decource again or uncw.—re-dec-o-rations, re-ded-i-cate, re-dekto-rations, re-ded-i-cate, re-dekto-rations, re-dectin-re-ded-i-cate, re-ded-i-cate, re-decin-re-dec

e-fine. Te' di-fin. v.t.—redefined, finner. To define one more; to altere the definition of —re-def-i-al-tilen, te' def-i-nih'm, re-de-llv-er, re' del-liv-er, re' de-liv-er, re' de-mand, re' di-mand, re' di-mand, re' di-mand, re' di-mand, re' di-mand, re' di-mand, re' de-mand a bita, a re' demp-tion, (Fr. redemption), (C. F. redemption), (Fr. redemption),

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ing. up;

red-created pochard duck, Natur rejoured. red-beed ed, red, red-beed ed, red-beed ed, red-beed ed, red-beed ed, red-beed e

wig, hw as sound in whig; z- zh as in azure, zeal. Italicized powel indicates schwi

packages dis errice, n. That part or a cry packages dis errice, n. That part or a cry lamb and many brothels, named from the man of identifying such emblishments with a red light, and such emblishments with a red light, and such emblishments with a red light, and such emblishments and laborer of southern U.S. Same, a poor white med laborer of southern U.S. Same, a red, rado, rado,

a: Uniffice redowns which is the stilling.

11-48. It does, n. Chom. abbt. for the mattern-reduction process.

12-49. The color of the mattern red-penalited, red-penalited, red-penalited, red-penalited, red-penalited, remise, delete, or otherwise correct; to appear to the remise, delete, or otherwise correct; to appear to the remise, delete, or otherwise correct; to appear to the remise, delete, or otherwise correct; to appear to the remise.

redistill re'distil', v.t. To distill again.

The control of the c

undoing of wrong; reparation; indemnification; correction. residence, resid

reacting the latter it moves away from earth, red sin-kin, n. A scarler and black finch, Cardwist cucultata, native to northern S. America, popular as a cage bird, red-skin, red-skin, r. A. N. American Indian, red-skin, red-sk

Indian.

red saap-per, s. A reddish, edible, salt water fish of the genus Lugereut, found along the Fortida coest and in the Guil of Mersion.

red spi-der, s. Any of various small mires, parasitic on certain crope. Also red spi-der miles.

mits.

red squill, s. An onionlike European plant,

Urrines maritims, used in making rat

poison.

red squill, n. An onionlike European plant, Urgines markines, used in making rat poisson.

red start, red start, n. A brightly colored American wurbler, Strophage reaccille, the male largely black with orange packets on wing and till, and constantly spreading in tail like a fan. A small European thrush, Phoesicaria phonicaria, with red on tail and breast; also bean small. Burdens thrush, Phoesicaria phonicaria, with red on tail and red tape, n. Rigid or excessive routines and red tapes, n. Rigid or excessive routines and red tapes, n. Rigid or excessive routines and red tapes, n. A reddish tage on sea water counsed by the proposition of the propositio

arrangement; to weaken or dilute, as alcohol; math, to be time to the simplest common or to a lower math to the simplest form or to a lower math to the simplest common or to a lower math to the simplest common or to a lower math to the simplest math to the simplest common or to

b fat, fate, fâte, fate, fall; e- met, mê, mêre, hêr; i- pin, pine; e- not, note, move; u- rub, cube, bull; oi- oil; ou- pound.

rë-di-rec'tion, n. a redirecting. rēdis-būrse', s.f. to repay or refund.
rēdis'gount, s.f. in banking, to discount again; to subject to a second discount: said of commercial paper.

rë dis'count, n. dis'count, n. 1, a rediscounting.
2. [usually pl.] rediscounted commercial

rē-dis-sēlze', v.l. to disseize again or anew rē-dis-sēi'zin, n. in law, a disseizing or being disseized a second time.

rē-dis-sēl'zōr, w. a person who disseizes lands or tenements a second time, or after a re-covery of the same from him in an action of

re dis trib'ute, v.t. to distribute again; to deal back again rē-dis-tri-bū'tion, n. a dealing back, or a sec-

and distribution

Tedia trict, v.i. to divide into new districts, especially in order to reapportion electoral representatives; to make a new arrangement of the districts of.

re-di'tion (-dish'un), n. return. [Obs.] red-i-vi'vus, a. [L.] brought to life again; re-

red'knees (-nēz), n. a plant, smartweed. red lead (led), red oxide of lead. Pb₂O₄, derived from massicot, used in making paint, in glassmaking, etc.; minium.

red lead ore, a mineral, crocoite, a red chromate of lead: also called red lead spar.

red'legs, red'leg, n. 1. any of various birds; as. (a) the redshank; (b) the turnstone, Strepsilas interpres; (c) the red-legged partridge of Europe.
2. a plant, the bistort.

red'-let'ter, a. happy; memorable; as, a redletter day.

red-letter day; a fortunate, happy, or ausreatetter day; a fortunate, nappy, or auspicious day; so called because the holy days, or saints' days, were marked on the old calendars with red letters; a day of notable events or occurrences; a day to be remembered in a special manner.

special manner.
red light (lit), 1. a danger signal.
2. a signal used to bring trains, automobiles, etc. to a stop; stop light.
red'-light' dis'trict, a section of a town or city in which there are many houses of prostitution: so called because, formerly, it was customary to display a red light above the doors of such houses.

red'ly, adv. in a red manner; with a red color.

red morrocyco, a plant, the pheasant's-eye. red'mouth, n. a fish, the grunt. red'ness, n. the quality of being red; red color. red'o-lence, red'o-lency, n. the quality or state of being redolent; sweet scent; fragrance

grance. red'o·lent, a. [L. redolens, redolentis, ppr. of redolere, to emit a scent; red-, re-, and olere, to

smell.]

1. sweet-smelling; fragrant.

2. smelling (of); as, redolent of flowers.

3. suggestive (of).

rē-dōu'ble, v.i.; redoubled (-bld), pt., pp.; redoubling, ppr. [Fr. redoubler.]

1. to make twice as much or twice as great; to increase two-fold.

2. to repeat-tod.

dread. [Rare.]
rēdoubt', n. [Fr. redoute; It. ridotto; ML. reductus. a refuge, orig. pp. of L. reducere.]
1. in military science, (a) a temporary outlying fortification or breastwork, used to secure hilltops, passes, or the flanks of entrenchments; (b) in permanent fortifications, a breastwork surrounded by a parapet and dominated by guns from the heavier fortifications behind it.
2. a stronghold.
rē-doubt'à-ble. a [OFr. reductions]

rē-doubt'à-ble, a. [OFr. redoubtable, from re-doubter, to fear or dread; L. re-, again, and dubitare, to doubt.]

1. formidable; that is to be dreaded; ter-

rible; fearsome

2. deserving of respect; as, a redoubtable rē-doubt'a-bly, ads. in a redoubtable manner;

so as to be redoubtable. re-doubtable. [Ar-

chaic.]
rē-doubt'ing, m. honor; reverence. [Obs.]
rē-dound', v.s.; redounded; pt., pp.; redounding, ppr. [Pr. redounder; L. redundare, to overflow; red., re-, and undare, to surge, swell, from unda, a wave.]

1 to have a result or effect (to the credit

1. to have a result or effect (to the credit or discredit, etc. of someone or something); as, this work will redound to his credit.

2. to come back; to react: to recoil (recon).

2. to come back; to react; to recoil (upon): aid of honor or disgrace. 3. to flow back, as waves. [Obs.] 4. to be redundant; to overflow. [Obs.]

rē-dound', n. 1. a coming back by way of consequence; return; result; requital.

2. reverberation; rebound. [Rare.] red'our, n. violence. [Obs.]
rē-dout', n. a redoubt. [Obs.]

red'out', n. a redoubt. [Obs.]
red'owâ, n. [Fr., from Bohem. rejdowâk, a
kind of dance, from rejdowât, to turn.]
1. either of two ballroom dances of the 19th
century, one form of which resembles the
polka, but is of a more lively nature, the
other form resembling the waltz.
2. the music for either of these.
red'nall music for either of these.

2. the music for either of these.

2. the music for either of these.

red'põll, n. [red and poll (the head).]

1. any of a number of finches of the genus Acanhis, the males of which usually have a red patch on the head.

2. any of several other birds, as (a) the European linnet; (b) the redpoll warbler, Dendraca palmarum.

rē'draft (or rē-draft'), n. 1. a second or later draft or framing, as of a legislative bill.

2. a draft on the drawer or endorser of a protested bill of exchange, for the amount of the bill plus charges and costs.

rē-draft', v.t. to draft anew or again.

rē-draw', v.t.; redrew, pt.; redrawn, pp.; redrawing, ppr. to draw again; to make a second draft or copy of.

rē-draw', v.t. to draw a new bill of exchange, as the holder of a protested bill, on the drawer

the holder of a protested bill, on the drawer or endorsers.

rē-dress', v.t. to dress again: variously applied; as, to re-dress a wound; to re-dress a doll.

rē-dress', v.i.; redressed (-drest), pi., pp.; re-dressing, ppr. [Fr. redresser, to straighten.]

1. to correct and compensate for, as evils, abuses, afflictions, etc.

2. to correct to remedy any facility.

ouses, amictions, etc.

2. to correct; to remedy, as a fault.

3. to compensate; to make amends to.

4. to adjust; as, redress the balances.

5. to place upright; to erect. [Obs.]

re dress', v.i. to rise again to an erect position. Obs.]

e'dreas (or rē-dres'), n. 1. compe satisfaction, as for a wrong done. 2. a redressing. 3. reformation; amendment. [Obs.] rē'dre 1. compensation:

4. one who or that which redresses. [Obs.] Syn.—remedy, relief, amends, compensa-Syn.—remedy, tion, reparation,

Syn.—remedy, relief, amends, compensation.

redoubling, ppr. [Fr. redoubler.]

1. to make twice as much or twice as great; to increase two-fold.

2. to repeat; to do or say again.

3. to echo or re-echo.

4. to refold; to double back.

5. in bridge, to double the doubled bid of (one's opponent).

2. to re-echo; resound.

3. in bridge, to double a bid that an opponent has already doubled.

2. to re-echo; resound.

3. in bridge, to double a bid that an opponent has already doubled.

6. double, n. in bridge, a redoubling.

7ê-doubl', n. [Fr. redoute; It. ridotto; ML. reducts.] a refuge, orig. pp. of L. reducter.]

1. in military science. (a) a temporary outlying fortification or breastwork used to secure hilltops, passes, or the flanks of enterchments; (b) in permanent fortifications, a herestwork contents as much or twice as great or twice as much.

2. to re-echo; resound.

3. in bridge, to double a bid that an opponent has already doubled.

4. to re-echo; resound.

5. in bridge, to double a bid that an opponent has already doubled.

6. to re-echo; resound.

7. edress'ile, a. capable of being redressed. relieved, or indemnified.

7. redress'ile, a. capable of being redressed: redress'less, a. without relief; incapable of being redressed: [Rare.] redress'less, a. without relief; incapable of being redressed: [Rare.] redress'less, a. without relief; incapable of being redressed: [Rare.] redress'less, a. without relief; incapable of being redressed: [Rare.] redress'less, a. without relief; incapable of being redressed: [Rare.] redress'less, a. without relief; incapable of being redressed: [Rare.] redress'ess. redress'less, a. without relief; incapable of being redressed: [Rare.] redress'ess, a. and fine strength in the redress'ess. red

bloodroot.
red rust, a fungous disease appearing on the leaves and stem of growing grain.
red'sēar, v.i. to break or crack when too hot, as iron under the hammer; to be red-short.

red'seed, n. small crustaceans, as copepods, etc., which float near the sea surface and are eaten by various fishes.

red'shañk, n. 1. any bird of the snipe family belonging to the genus Totanu: so called from its red legs. Totanus calidris is about 11

inches long, lives in the British Isles all the year, but is known also as a summer bird of passage in the most northern parts of Europe passage in the most northern parts of Europe and Asia, occurring in winter as far south as India. The spotted redshank, Tolanus fuscus, visits Great Britain in spring and autumn on its migrations north and south.



2. the fieldfare, Turdus pilaris.
3. a Highlander: so called in derision of his bare legs.

A generation of Highland thieves and red-shanks.—Milton.

shanks.

red share', a. red-short. [Obs.]

red'-short', a. brittle when red-hot: said of iron or steel with too much sulfur in it.

red-short'ness, n. the quality of being brittle when red-hot: said of certain kinds of iron.

red'aides, n. a small cyprinoid American fish.

Notropis ardens; the redfin.

red'akin, n. a North American Indian: so called from the reddish or coppery color of the skin.

skin.

Red Stär, an international organization having for its objective the humane treatment of
animals: it had its inception in Switzerland.
red'stärt, n. [red and start (from AS. steort), tail.]

1. a small. handsome, sing-ing bird, Ruticilla phanicura, be-longing to the warbler family, Sylviadz, nearly allied to the nightingale, but having a more slender form and bill, a reddish tail, and a peculiar darting flight. It is widely diffused over Eu-



diffused over Europe, Asia, and Editar (Recall and almost all parts of Great Britain as a summer bird of passage. It has a soft and sweet song, which is continued during the breeding season far into the night. The black redstart, Ruicilla tithys, is distinguished from the common redstart by being sooty-black on the breast and belly where the other is reddish-brown.

2. an American fly-catching warbler, red, black, and white, a small bird of the family Muscicapidz, or flycatchers, common in most parts of North America.

Also called rediail, firetail, firefiri, and brantail.

blue-throated redstart; same as bluckroat, ed streak, n. 1, a sort of apple so called from

red'streak, n. 1. a sort of apple so called from its red streaks. 2. cider pressed from redstreak apples.

red'tāil, n. ed'tāil, n. 1. the red-tailed hawk or buzzard, Buteo borealis, of North America: also called hen hawk, and red-tailed buzzard.

hen hawk, and red-tailed buzzard.

2. same as redstart.
red'-tāiled', a. having ared tail, as various birds.
red-tailed hawk; same as redtail, sense 1.
red'-tāpe', a. of, pertaining to, or characterized by red tape, or official routine, formality, delay, etc.; as, red-tape statesmen.

ed tape, (after the tape commonly used to tie

red tape, [after the tape commonly used to be official paper.]

1. official forms and routines.

2. rigid application of regulations and routines, resulting in delays and exasperations in getting business done.

red'-taped' (-tapt'), a. pertaining to or affected by red tape.

red"-tap'er-y, n. same as red-tapism.

red"-tap'sm. n. the system of red tape or ex-

red"-tāp'ism, **. the system of red tape or excessive official routine; strict or punctilious adherence to official formalities.

red"-tāp'ist, n. 1. one employed in a public office who ties his papers with red tape; hence, a mere government clerk.

1513

use, bull, brute, turn, up; cry, myth; cat, machine, ace, church, chord; gem, anger, (Fr.) bon, as; this, thin; azure

DEPOSITION EXHIBIT 1001se 7-27-97

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1977

MARY HILLABRAND, INC. 1717 17th Street San Francisco, CA 94103 (415)255-1994

Date: February 26, 1997

TERESA D. LaFROMBOISE 1515 Alameda de Las Pulgas San Carlos, CA 94070

Re: Harjo, et al. vs. Pro-Football, Inc.

Taken on: February 17, 1997

Dear Ms. LaFromboise:

The original transcript of your deposition in the above case is available for reading and signing in our offices for up to 30 days from the date of this letter.

If you are represented by counsel, you may wish to review and sign your attorney's copy of the transcript. Your attorney can then notify us and opposing counsel of any changes you may have made in your testimony.

Sincerely yours,

Candida Smith

cc: All counsel

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Registration No. 1,606,810 (1	REDSKINETTES)
Registered July 17, 1990,	
Registration No. 1,343,442 (SKINS	S)
Registered June 18, 1985,	
Registration No. 1,085,092 (REDS	KINS)
Registered February 7, 1978,	•
Registration No. 987,127 (THE RE	DSKINS & DESIGN)
Registered June 25, 1974,	, , , , , , , , , , , , , , , , , , ,
Registration No. 986,668 (WASHI	NGTON REDSKINS & DESIGN)
Registered June 18, 1974,	ŕ
Registration No. 978,824 (WASHI	NGTON REDSKINS)
Registered February 12, 1974,	
and Registration No. 836,122 (THE	E REDSKINS - STYLIZED LETTERS)
Registered September 26, 1967	•
G G1 II :	`
Suzan Shown Harjo,)
Raymond D. Apodaca,)
Vine Deloria, Jr.,)
Norbert S. Hill, Jr.,)
Mateo Romero,)
William A. Means, and)
Manley A. Begay, Jr.,)
)
Petitioners,) Cancellation No. 21,069
)
v.)
)
Pro-Football, Inc.,)
)
Respondent.)

TRIAL DEPOSITION EXHIBITS FOR
PETITIONERS' NOTICE OF RELIANCE (NR8)
DEPOSITION EXHIBITS GN Exs – WS Exs
VOLUME 3

GeoffreyD. Numberg

Curriculum Vitae April, 1996

Xerox Palo Alto Research Center 3333 Coyote Hill Road Palo Alto, California 94304 Telephone: (415) 812-4711 Fax: (415) 812-4777 nunberg@parc.xerox.com nunberg@csli.stanford.edu Born: June 1, 1945 Citizenship: U.S.A.

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1972-1977 Department of Linguistics, Graduate Center, City University of New York. January 1978: Ph.D. awarded

1971-1972 Department of Linguistics, Graduate School of Arts and Sciences, University of Pennsylvania. 1973: M.A. awarded

1969-1971 School of General Studies, Columbia University. 1971: B.A. awarded

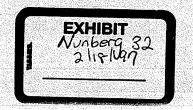
1962-1964 Columbia College, Columbia University

Positions Held:

1986-present	Xerox Corporation, Corporate Research and Technology. 1986-present, Research Scientist, Xerox Palo Alto Research Center 1993-present, Research Scientist, Rank Xerox Research Centre, Grenoble [principal base, April 1993- November, 1994]
1988-present	Consulting Professor, Department of Linguistics, Stanford University (Associate Professor, 1988-1992, Full Professor, 1992-)
1980-1985	Stanford University. Visiting Assistant Professor, Department of Linguistics Researcher, Center for the Study of Language and Information
1979-1980	Assistant Professor, Department of Linguistics, U.C.L.A.
1978-1979	Fulbright Lecturer, University of Rome
1977-1978	Postdoctoral Fellow, Institute for Human Learning, University of California at Berkeley
1976-1977	Instructor, Department of English, Brooklyn College of C.U.N.Y.
1975-1976	Instructor, Department of Anthropology, Hunter College of C.U.N.Y.

Other Affiliations:

1984-present	Research Associate, Center for the Study of Language and Information, Stanford University
1987-present	Affiliated Research Scientist, Institute for Research on Learning, Palo Alto, California
1992-present	Membre Associé, Centre de Recherche en Epistémologie Appliquée (CNRS), Paris
1991	Member of Faculty, Linguistic Society of America Summer Institute, University of California at Santa Cruz



Areas of Specialization

Linguistics and Natural Language:

Semantics and pragmatics, lexical semantics and lexicography Structures and genres of written language (theory and technology) Normative grammar and linguistic criticism (history and theory) Language policy (US and comparative)

Technology and communication (history and theory)

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Regular language commentaries, "Fresh Air," National Public Radio, 1989-present. Individual pieces published in various magazines in US and Europe.

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A method for manipulating digital data [natural-language structure editor] (first-named applicant, with Tayloe Stansbury, Curtis Abbott, and Brian Smith). European patent application 89312093.1-. (1989).

Other Activities:

Referee of articles or manuscripts: Language, Linguistic Inquiry, General Linguistics, Linguistics and Philosophy, Recherches Linguistiques, Natural Language and Linguistic Theory, Philosophical Review, Synthese, Yale University Press, Cambridge University Press, Stanford University Press, Oxford University Press, University of Chicago Press, MIT Press, D. Reidel, Sage Publishing.

Referee of grant proposals: National Science Foundation (sections on linguistics, computer science, AI and robotics, psychology); National Foreign Language Center; National Institute of Mental Health, National Endowment for the Humanities

Advisory Board, Language Rights Project, Asian-Pacific American Legal Center, 1989-1991 Executive Committee, National Coalition for Language Rights (co-founder), 1988-Advisory Board, Californians United (co-founder), 1986-1988

Committee on Political and Social Concerns, Linguistic Society of America, 1990-

Usage Editor, The American Heritage Dictionary, Second Edition.

Usage Editor and Chair of Usage Panel, *The American Heritage Dictionary*, Third Edition. Ongoing consultancy with Houghton Mifflin.

Notes for deposition: Denotation and connotation

There are two kinds of terms, denotative and connotative.

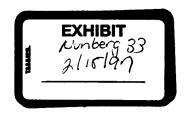
A denotative term refers neutrally to its referent; any connotations associated with a particular use of the term are determined by the context and on the specific attitudes of the speaker and hearer towards the reference of the term. A word like *lawyer* may have positive connotations in one context ("I want my daughter to become a lawyer") and negative connotations in another ("Good Lord, you sound like a laywer"). Similarly for a word like *communist*, depending for example on whether it is uttered by Ronald Reagan or Angela Davis.

With a connotative term, by contrast, the connotations of the use are "built into" the word itself. The word *shyster*, for example, is intrinsically or semantically pejorative; we do not have to know anything about the context or the speaker's attitude about lawyers to evaluate the word negatively. Similarly the words *commie* for communist, *Bimbo* for woman, and so forth. The connotations of such words cannot be suspended or reversed, though they can sometimes be exploited for humorous purposes, as frequently happens among the members of a group the term applies to -- for example when a lawyer greets a former colleague on the phone with, "Joe, you old shyster you!"

(Words can have positive connotations as well. *Tin Lizzie* is denotatively synonymous with Model T, but has generally affectionate connotations. Analogously, to describe a particular social group as a "community" generally implies that the group is a source of positive social values; for this reason we don't ordinarly speak of the "loan-shark community" or the "terrorist community," for all that those are organized social groups.)

A connotative term inherits its particular connotations from some stereotype or cluster of social evaluations that attaches to its reference. *Commie*, for example, tends to evoke the demonic image of communists that was widespread in America during the Cold War period; fairy evokes the stereotype of effeminate homosexual men; *coffin nail* evokes the associations of harmfulness associated with cigarettes.

It often happens that the language will have several connotative terms associated with the same category. Lawyers, for example, may be described as *shysters*, *ambulance chasers*, *mouthpieces*, *pettifoggers*, and so forth, as well as with positively connotative terms like *jurist*; each of these picks up a somewhat different stereotype associated with the category. These words are of course not precise denotative synonyms -- that is, they do not each refer to exactly the same class of people -- since the relevant stereotype may be more-or-less appropriate to a given member of the legal profession. Relative to a given context, the speaker's choice of *shyster* versus *pettifogger* will depend on the particular evaluation that the speaker wants to convey. Similarly, the essentially denotative term marijuana is paralleled by connotative terms like *dope*, *tea*, *pot*, and so forth, each of which picks up a slightly different picture of marijuana use.



The stereotypes or connotations associated with the name of a group or category are often complex, particularly when the group or category is the subject of complex and changing social attitudes. Over the course of its history, *Redskin* has at various times evoked the dim "noble savage" of Cooper, the uncivilized and ferocious savage of 19th century westerns and the early western film, or the comical buffoon of movies like Eddie Cantor's *Whoopie!* or Disney's *Peter Pan* -- all depending on the prevailing and sometimes complementary stereotypes associated with Indians.

How we determine the connotations of words

We learn the meanings of connotative words by associating their use with certain characteristic contexts, where the relevant attitudes or stereotypes are salient. Of course such attitudes are independently marked in every context the word is used in; often the word is left to do the work of conveying the speaker's attitude all by itself. If you did not know the meaning of the word *shyster*, and hear someone say, "That law firm has a lot of shysters," you may not be able to tell whether the connotations of the word are positive or negative -- that you could learn only if you had heard sentences like "A shyster like Jones would stop at nothing to win a case." The existence of the first sentence is not, however, a counterexample to the generalization that the word *shyster* is pejorative; it merely does not demonstrate that point independently. By contrast, if we were to find *shyster* used in positive as well as negative contexts, we would conclude that the word must be a neutral (i.e., purely denotative) substitute for *lawyer*. But of course we are unlikely to encounter sentences of the form "John is a fine shyster and a good family man."

Connotation and informality

The mere fact that the language provides several synonyms or near-synonyms for a single category does not entail that all or most of these must be connotative. Often words vary along the register of register, that is, roughly, in their degree of formality. For example, whereas *shyster* is a connotative term, the word *attorney* is used (at least by lay persons) merely as a somewhat formal substitute for "lawyer." Similarly, the words *quack* and *sawbones* are connotative substitutes for "physician," whereas the word doc (as in "He's a doc") is merely an informal substitute, which bears no particular connotations over and above its informality.

Connotation notes, 2: Distinguishing informal from connotative terms.

The difference between connotative and register-specific (i.e., formal or informal) terms is that the use of the former is determined by the evaluation of the referent that the speaker or the speech-community associate with the term, whereas the use of the latter depends simply on the relative formality of the context. By way of example, the word Brit is an informal variant in American speech for "Briton," "Britisher," or (loosely) "Englishman" (the word *Yank* is also a good example, but presents problems for automatic search because it is homonymous with the common verb *yank*).

To demonstrate this point, I made a search of the Dialog newspapers database for instances of the words *Brit* or *Brits* (filtering out references to the journalist Brit Hume). The search turned up 21, 261 instances; a hand search of 100 of these showed that all involved references to the national group, so we can presume that almost all of the remainder involve that sense.

What is more, the uses of *Brit* were generally referential rather than "mentioned," as linguists put it: that is, they involved actual references to persons of British origin rather than discussions of the term qua term, which was the preponderant pattern with *Redskin*. Moreover, the use of the word was independent of the speaker's evaluation of Britishers, which might according to the context be positive, negative, or neutral. For example:

We hoped the cultured ways of the Brits would drift west, bringing us those polite souls who can enforce the law by appealing... Boston Globe

Rob Lowe, Brian Bedford and director Michael Langham, the latter two gentlemen being displaced Brits. Boston Globe.

The latter, as you may already have concluded, is more a concern for Brits, who have not had a heavyweight champion since an Australian named Bob Fitzsimmons won the... Boston Globe

This is a whole new Jonathan Raban: the Brit elitist traveler as hotel bumbler. Washington Post

They will do this knowing that the West Germans, the Italians, the French and the Brits have over the years spawned off on us some of the most outrageously awful four-wheeled vehicles ... Washington Post.

What does such rigor get the Royal Navy? Ask a Brit skipper, and he'll tell you: Man for man it gets them better COs. It is not hard to get American submarines commanders to say the same thing--in private. "The Brits? They're my heroes," one of our best sub commanders told me over dinner. Boston Globe.

... in bookkeeping and tracking investment results, selection of a dozen funds would be, as the Brits would have it, a matter of over-egging the pudding. Boston Globe

What of *Redskin*? If it were a neutral informal term, as Barnhart and Butters have claimed, we would expect it to show a distribution something like that of *Brit*. Instead we find:

- a. By contrast, a search of the same database turned up only 70 instances of the use of *Redskin* to refer to Native Americans (as opposed say to the football team or to a type of potato); that is, the use of (the relatively rare)*Brit* as an ethnic term is roughtly 300 times as frequent in the press as the use of *Redskin* to refer to Indians. (For fuller figures, see attached exhibit.) This suggests that the term is being systematically avoided in print
- b. The vast preponderance of the uses of *Brit* are chiefly referential -- that is, they refer to particular persons or groups. (A hand examination of 100 instances showed that all of them had this use.) By contrast, the uses of Redskin tend to be "mentions" of the term: that is, people talk about the term qua term rather than using it to refer to particular Indians or Indians in general. One indication of this point is that the word is very often put in "shudder quotes," which serve to distance the writer from responsibility for its content.

In almost every movie, the bad guys bit the dust, and that was the end of their story. Another cartoon figure had been erased from the script. As we rejoiced in their agony and cheered their demise, it never occurred to us that the "redskins," "krauts" and "Japs" represented real people. San Francisco Chronicle (SF) - FRIDAY, July 30, 1993 By: D.L. Stewart,

[It] is an embarrassing relic of a time when it was acceptable to use words and phrases like "heaps of Injuns" and "redskins" and "happy huntin' ground." Letter, the Chicago Tribune (CT) - SUNDAY October 27, 1991

Most Americans know and accept Indians only if they are feather-bedecked caricatures: "redskins" and "braves" who bear Hollywood names like Tonto and Iron Eyes and do fine as targets for John Wayne's hundred-round six-shooter. Seattle Times (SE) - Sunday May 6, 1990 By: JOHNNY P. FLYNN LOS ANGELES TIMES

I do not take lightly the term "Redskin," its use by Miami University or any other organization. I stood before the Miami University president and all who were in attendance at that forum and stated, "I am offended by the use of this name, Redskin," to no avail. Letter to the editor, CINCINNATI POST (CP) - Wednesday, January 19, 1994

"As far as quality, the movie is far superior to the book, which has not weathered all that well," said Hoag, associate professor of English at Wichita State University, about James Fenimore Cooper's classic novel. "It's a very exciting adventure work, but Fenimore Cooper did not know beans about Indians. He used all the old cliches — palefaces, redskins, squaws — that are offensive to Indians." Wichita Eagle, September 25, 1992 By: Bob Curtright

David Locklear remembers watching Westerns as a child. "Now they make me sick. You know the scene where the guy gives his wife a gun and says, 'Shoot yourself. It's better to die than have a Redskin touch you.' 'Audrey Green recalls a sign in a South Carolina restaurant. "No Indians or dogs eat here." The Columbia, SC State, January 26, 1993

A man who resigned from the Pulaski County sheriff's office because of alleged harassment as an American Indian has won \$24,727 in a race discrimination lawsuit. Shan Gachot, 28, of North Little Rock, was a sheriff's office employee for more than two years before he quit Feb. 5, 1992. He said he was called "chief," "Indian Joe" and "redskin." INDIAN WINS SUIT OVER RACE BIAS, COMMERCIAL APPEAL (Memphis) (CA) - SUNDAY, September 12, 1993

What is even more puzzling is Roget's failure to draw distinctions between the "nonformal" and the downright unacceptable. The fourth cites certain words as derogatory; the fifth does not. It lists such pejoratives as "spade,""nigger," "honky," "redskin," "gook" and "slant-eye" as nonformal and altogether ignores other, similar terms. TIME INTERNATIONAL (TII) - September 14, 1992

Appeals Judge Walter J. Cummings, in writing the opinion, disagreed with Crist's contention that racism was not involved. Cummings noted in his opinion that protesters called Indian spearers "Tonto," "redskin" and "welfare warriors." Indian customs and rituals were mocked, he wrote. DECISION BACKING TREATY RIGHTS IS GRATIFYING Capital Times, Tuesday, December 13, 1994

The State Journal's Nov. 16 editorial ``Racism: Some don't get it" accurately points out that commonly used epithets such as ``gook," ``spic," ``nigger" or ``redskin" may be offensive to referenced groups, regardless of the connotation held by the speaker himself. `REDNECK' IS ALSO OFFENSIVE TERM Wisconsin State Journal (WJ) - TUESDAY, November 23, 1993

Most Americans know and accept Indians only if they are feather-bedecked caricatures: "redskins" and "braves" who bear Hollywood names like Tonto and Iron Eyes and do fine as targets for John Wayne's hundred-round six-shooter.

DEADLY DRINK SONGS THAT KEPT INDIANS' BEASTS AT BAY ARE SILENT Seattle Times (SE) - Sunday May 6, 1990

'BLACK ROBE' PERPETUATES 'SAVAGE REDSKIN' STEREOTYPE Oregonian (PO) - SUNDAY December 22, 1991

Native American activists say the mascot represents a racist stereotype of their heritage. They also say the word Redskin is a racial slur. Naperville board puts off ruling on school's Redskin mascot Chicago Tribune (CT) - THURSDAY January 24, 1991

Note that this pattern holds even for letter-writers who are critical of efforts to get the Washington Redskins to change the name of their organization:

This country seems to be getting more divided than ever. The Native Americans used to call us "Paleface," and they were "Redskins." It's Murphy's Law, you know. Ethnic humor is ethnic humor and history is history, and you're letting the liberal egoists change it all. Letter to Chicago Tribune.

Sally Moomaw ("Miami models disrespect for other cultures," Dec. 23) alleges Miami University's use of the name "Redskins" is offensive and racist. If this is so, why is it that only a minority believe this is true? Are the rest of us in need of some sensitivity training to show us the light?... Ms. Moomaw's position is fatally flawed. If the name is so offensive, the obvious conclusion is that the Oklahoma Indians need to be protected against their own ignorance. LOGIC JILTED AT ALTAR OF POLITICAL CORRECTNESS CINCINNATI POST (CP) - Thursday, December 30, 1993

Even where instances of *Redskin* actually refer to individuals or groups, rather than to the word itself, moreover, they almost invariably occur either in ascriptions of the words to other speakers, or in discussions of movie Westerns or of the old West, usually with a clear ironic intent:

David Locklear remembers watching Westerns as a child. "Now they make me sick. You know the scene where the guy gives his wife a gun and says, 'Shoot yourself. It's better to die than have a Redskin touch you.' 'Audrey Green recalls a sign in a South Carolina restaurant. "No Indians or dogs eat here." The Columbia, SC State, January 26, 1993

Subscribers to the Another-Pesky-Redskin-Bit-the Dust school of western history will be happier, though they will clamor for more blood and less analysis.

Lexington Herald-Leader (LH) - SUNDAY June 21, 1992

The only antidote to portrayals of screaming redskins who can't hold their firewater is to get more Indians involved in movie-making, both in front of and behind the camera, Torres says. INDIAN ACTRESS WANTS TRUTH, NOT CORN, IN MOVIES ABOUT HER PEOPLE, LOS ANGELES TIMES (LT) - THURSDAY October 1, 1987

Early in the book, Connell sets Custer's context: "Early in the 19th century under James Monroe an Indian program began to take shape. God alone could guess how many millions of square miles of useless land unrolled beyond the frontier, therefore boost all redskins west. Let them join their wild western cousins, leaving the United States to civilized people. BOSTON GLOBE (BG) - THURSDAY March 7, 1985

Several other citations involved quotations from 19th-century sources: a story from the *Arizona Republic* on the first issue of the *Arizona Republican* in 1890 described a report that said that "a redskin was trampled to death by horses"; the modern writer added that this dispatch "would jar today's readers." And one story quotes the Indian poet Adrian Louis, "who writes in 'Fire Water World,' published by little West End Press of Albuquerque, of 'squaw-chasing sodbusters who spit on redskins by daylight" — a use set in the 19th-century context, and clearly intended to reflect the disparaging character of the word.

In fact, the search turned up no modern examples of the use of *Redskin* in a neutral, referential way, parallel to the uses of *Brit*. above. That is, there were no sentences of the form, "Redskin actor Jay Silverheels was honored yesterday..." or "There are a number of Redskins living in the county...." The absolute or near-absolute avoidance of this sort usage in print is a strong indication of the fact that *Redskin* is not merely an informal variant of *Indian*, but rather is charged with strong negative connotations. People simply do not refer to Indians as "Redskins" in public, except when they are invoking a historical context.

THE OXFORD ENGLISH DICTIONARY

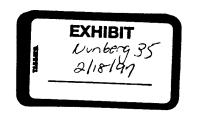
SECOND EDITION

Prepared by
J. A. SIMPSON and E. S. C. WEINER

VOLUME XIII

Quemadero-Roaver

CLARENDON PRESS · OXFORD
1989



BLA-TTAB-06161

Oxford University Press, Walton Street, Oxford Ox2 6DP
Oxford New York Toronto
Delhi Bombay Calcutta Madras Karachi
Petaling Jaya Singapore Hong Kong Tokyo
Nairobi Dar es Salaam Cape Town
Melbourne Auckland
and associated companies in
Berlin Ibadan

Oxford is a trade mark of Oxford University Press

C Oxford University Press 1989

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British Library Cataloguing in Publication Data
Oxford English dictionary.—2nd ed.
1. English language-Dictionaries
I. Simpson, J. A. (John Andrew), 1953II. Weiner, Edmund S. C., 1950423
ISBN 0-19-861225-7 (vol. XIII)

Library of Congress Cataloging-in-Publication Data The Oxford English dictionary.—2nd ed. prepared by J. A. Simpson and E. S. C. Weiner Bibliography: p.

ISBN 0-19-861186-2 (set)

ISBN 0-19-861225-7 (vol. XIII)
ISBN 0-19-861186-2 (set)

1. English language—Dictionaries. I. Simpson, J. A.
II. Weiner, E. S. C. III. Oxford University Press.

PE1625.087 1989
423—dc19 88-5330

Data capture by ICC, Fort Washington, Pa.
Text-processing by Oxford University Press
Typesetting by Filmtype Services Ltd., Scarborough, N. Yorks.
Manufactured in the United States of America by
Rand McNally & Company, Taunton, Mass.

19/01.

1963 Nature 16 Mar. 1041/1 Some broad lines. may be red-shifted hydrogen lines. 1964 Lustener 20 Aug. 266/2 Matthews and Greenstein were able to identify the lines of 5C 48, which they found to be red shifted by 37 per cent. 1973 Nature 3 Aug. 204/1 As the 3 cm radiation propagates through an expanding Universe it will be redshifted. Ibid. 12.8 Dec. 517/1 The report. seems to provide a rare parallel to the visual pigments of the freshwater Osteichthyes, and to raise the question whether its pigment is a porphyropain or a redshifted rhodopsin. 1976 Pract. Electronics Oct. 793/3 They set up their apparatus to scan for the 11 cm line at what could be its redshifted wavelength. 1979 Nature 5 July 20/1 The apparent colours of the faint gaiaxy identifications (pressumably at redshifts of about 0-5) are considerably bluer than expected from redshifting the spectrum of nearby giant ellipticals such as M87.

tredship. Sc. Obs. [ad. obs. Du. reedschap

(Kilian), f. reeden to set in order, fit out: see REDE v. 1 Equipment, tackle. Also attrib. 1565 Aberdeen Burgh Reg. (Jam.), Ane Norroway yaucht, callt the James, with her haill redscring graicht. 1593 Compt Bh. D. Wedderburne (S.H.S.) 93 A crear callit the Lamb and

redshire, -share, a. Metall. ? Obs. [ad. Sw. rödskör: see RED-SHORT a., and cf. RED-SEAR; also the forms cold-share, -shire under COLD-SHORT. In first quot, associated with SHARE sb.] Red-

1665 D. Dudley Mettalum Martis (1854) 30 The 1665 D. DUDLEY Mettalum Martis (1854) 30 The Iron thereof made is very Redshare, which is that if a workman should Draw or Forge out a Share mould fit for a Plough in that red heat, it would crack and not be fit for the use of the Husbandsmans Plough or Share. 1674 J. STURDIE in Phil. Trans. XVII. 606 Some makes Coldshire-Iron, that is, such as is brittle, when it is Cold; another sort makes Redshire, that is, such as is a partic, when it is Cold; another sort makes Redshire, that is, such as is apt to break if it be hammered, when it is of a dark red Heat. 1794 S. WILLIAMS Vermont (1809) II. joi It does not answer so good a purpose; though it is neither coldshire, nor redshire.

red shirt, redshirt. 1. a. A supporter of

red shirt, redshirt. 1. a. A supporter of Garibaldi, esp. one of the thousand who sailed with him in 1860 to conquer Sicily.

1864 Young & Stevens Garibaldi: Life & Times Ixxv. 200 Naples had gone mad with joy: men, women, ragamuffins, priests, Redshirts, ex-Bourbon ibrin; lazzaroni...—all lent their voices to... the general cry of 'Viva Garibaldi:' Jiva Ixxvi. 202 Some of them mended their lives when Garibaldi came, and fought well in the ranks of the Redshirts before Capus. [1868 Marriort Vest. Chr. p. xviii. The red shirt of Garibaldi's troops.] 1848 F. Frenave tr. Levi's Christ stopped at Eboli xvii. 168 When King Franceschiello had to leave Naples... Garibaldi and his Red Shirts set out to attack him. 1979 Guardian 12 June 9/4 It took a march on Rome...—echoes of Garibaldi's thousand Red Shirts—to get water and elementary sewerage installed.

b. In more general use, a revolutionary, an anarchist, a communist.

anarchist, a communist.

anarchist, a communist.

1889 GUNTER That Frenchman! xi, The red-shirts of Messieurs Rochefort and Fleurens are uttering their cries of rage at law and order. 1909 Daily Chron. 12 Sept. 3/2 Because I made a stand in my native town for municipal ownership of public utilities. I was branded a 'red-shirt', dynamter', and an 'Anarchist'. 1911 H. S. HARRISON Queed xviii. 234 Queed wrote a stringing little article. holding up to public scorn journalistic red-shirts who curry-combed the masses. 1934 T. S. ELIOT Roch 1. 42 Enter redistrits in military formation. 1940 G. GREENE Power & Glory 1. 1. 13 You remember this place—before the Red Shirts came?

C. 5pec. A member of a Pathan nationalist.

c. spec. A member of a Pathan nationalist organization formed in North-West Province in

H

organization formed in North-West Province in 1921 and lasting until the creation of Pakistan in 1947; also attrib. or as adj.
1946; also attrib. or as adj.
1950 Civil & Milli. Gas. (Lahore) 1 June 1/5 In Mardan and Charsadda. the activities of the 'Red Shirts' have again increased. 1932 Ann. Reg. 1931 195 An organisation closely allied with Congress, the 'Red Shirt' Army under Abdul Ghaffar Khan, was a source of much anxiety in the North-west Frontier Province. 1948 G. CUNNINGHAM Diary in N. Mitchell Sir George Cummingham (1968) vii. 152, I could tell he felt he was on rather weak ground in talking about the Red Shirt activities by the twiddling of his bare toes. 1968 N. Mirchell. Sir George Cummingham v. 87 He records a recruiting meeting at Swabi. on 11th February, and the fact that four notonous ex-Red Shirts had publicy Riven him purses towards any war fund purpose.

2. U.S. A college athlete whose course is extended by a year during which he does not

extended by a year during which he does not take part in university events, in order to develop his skills and extend his period of eligibility at this level of competition. Also

attrib. as redshirt year.

1955 Life 5 Dec. 144/2 Although he is what the pros call redshirt, a player with one more year of college eligibility. five pro clubs are eyeing him. 1970 Time 7 Dec. 78 He worked even harder in his sophomore year as a 'redshirt'. Practicing with the variety but not playing in any games—so that he would have an additional year of eligibility. 1976 Honolule Star-Bull. 21 Dec. H-21 Crowe was coming off a redshirt year last season while Bonup was going through one

So as v. trans., to keep out of university competition for a year for the above reasons; so

competition for a year for the above reasons; so 'red-shirting vbl. sb.

1950 Birmingham (Ala.) News 27 Sept. 35. 1 He coached all the juniors and senior linemen and the boys red shirted. 161d. 10 Nov. C1/2 There are not enough players to have a 'B' squad or red shirt promising sophomores. 1958 Tutcaloosa (Ala.) News 8 Jan. 6/8 An anticipated argument over red shirting - the practice of holding athletes out of competition to prolong their eligibility-failed to develop 1963 San Francisco Chrons. 3 Dec. 44 He could have been red-shirted but he was an uncertain commodity last year; 1966 Time 14 Oct. 40 They 12c. the Big Ten] slos are forbidden to 'red-shirt' prospects—putting them on a five-year program, keeping them out of action as sophomores in order to beef them up. 1968 Daily Progress (Charlottesville, Va.) 10 Apr. A10 Edwards supported continuation of red-shirting, a common practice that permits an athlete to use four years to complete three years of varsity eligibility.

'red-short. 2. Metall [ad. Sw. rödsbört (sc. iero.)

red-short, a. Metall. [ad. Sw. rödskört (sc. jern iron) neut. of rödskör, f. röd red + skör brittle cf. COLD-SHORT and see REDSHIRE, -SHARE a.] Of iron: Brittle while in a red-hot condition, owing to excess of sulphur in the metal. Cf. HOT-

SHORT.

1730. 1773 [see COLD-SHORT]. 1795 PEARSON in Phil.

Trans. LXXXX. 342 There is another variety called red
ahort, which is malleable when cold, but brittle when
ignited. 1824 Mechanic's Mag. No. 52, 383 Norwithstanding
the superior quality of this iron, the bars made from it were
1.50 completely red-short, as to drop saunder. 1868
JOYSSON Metals 13 The ore also being free from phosphoric
cid, the iron was generally red-short. 1884 W. H.
GREENWOOD Steel 3 Iron x. 208 Antimony. produces
when present in small quantities in malleable iron, a metal
which is both cold-short and red-short.

Hence red-shortness, the quality or state of

Hence red-shortness, the quality or state of

being red-short.

1868 JONNSON Metals 14 Where much sulphur is present in the ore, it produces in the iron the quality known as 'red-shortness', 1874 J. A. PHILLIPS Elem. Metallurgy (1887) 323 The exact cause of red-shortness in welded iron is not always very clear.

red-shouldered, a. Ornith. Having the shoulder or bend of the wing red, esp. the redshouldered buzzard, falcon, or hawk of N.

America (Buteo lineatus).

1785 PENNANT Arctic Zool. II. 206 Red Shouldered F[alcon]. 1790 WHITE Voy. N.S. Wales App. 203 The Red Shouldered Paroquet. Pittacus Discolor. 1792 PENNANT Arctic Zool. (ed. 2) II. 143 Red-Shouldered Heron. 1809 SHAW Gen. Zool. VII. II. 421 Red-Shouldered Oriole. Oriolus pharmiceus. 1812 WILSON Amer. Ornith. VI. 86 Red-Shouldered Hawk. Falco Lineatus.. The Red-Shouldered Hawk is unneteen inches in length. 1884 Harper i Mag. Mar. 622:1 The red-shouldered hawk is a handsome bird.

redskin. Also red-skin. [See RED a. 5 c.] 1. A North American Indian. (Not the preferred term.)

term.)

1699 S. Smith in H. E. Smith Colomal Days (1900) 49 Ye firste Meetinge House was solid mayde to withstande ye wicked onsults of ye Red Skins. 1823 E. James Long's Exped. 1. 160 The whites will not harm the red-skins when they have them thus in their power. 1851 Dixon W. Penn xxiii. (1872) 205 A strong believer in the native virrues of the Redskins, when these savages were treated well. 1890 Times 27 Dec. 3/2 After dark the whole band.. renewed the attack. Kicking Bear himself leading the redskins.

attrib. 1699 S. Smith in H. E. Smith Colonial Days (1900) 49 My Honoured Father was as Active as ye Red-skin Men and sinewy. 1871 LUBBOCK in Jrnd. Anthrop. Inst. (1872) 1.

3 Though the Redskin family is constituted in a manner very unlike ours [etc.]. 1883 Athenseum 20 Jan. 81/1 A picture of redskin life.

2. A variety of potato.

redskin life.

2. A variety of potato.

1908 Chambers: Jrnl. Oct. 702/1 The chief products grown are potatoes. Tasmanian redskins are exported. 1973 Courier of Advertiser (Dundee) 21 Feb. 2:8 Scandinavia demands Redskin...and Maris Piper.

red snow. 1. Snow reddened by a kind of alga (Protococcus nivalis) common in Arctic and

red snow. 1. Snow reddened by a kind of alga (Protococcus nivalis) common in Arctic and Alpine regions.

1678 Phil. Trans. XIII. 976 On St. Josephs day, upon the Mountains call? de Langhe, there fell... a great quantity of red, or if you please of bloody Snow. 1820 BAUER in Ibul. CX. 165 The fungt, which constitute the colouring matter of the red snow, discovered in Baffin's 1839... 1818. 1820 Edin. Phil. Jrnil. 111. 397 (heading) Observations on the red snow of Mount St. Bernard. Ibul., Some imperfect observations on the red snow of Mount St. Bernard. Ibul., Some imperfect observations on the red snow of the Alps were made by M. Saussure in 1778. and the result of them appeared in the 3d volume of his Travels. 1866 Chamber! Encycl. 2.v., It is not impossible that animal as well as vegetable life may exist in red snow, and that real animalcules may have been observed. 1894 J. W. Moork. Meteorol. xx. 236 Red snow and green snow have been observed in the Arctic Regions and elsewhere. 1912 Q. Jrnil. R. Meteorol. Soc. XXXVIII. 220 The red snow first attracted attention because the hoof-prints of the pack animals... were observed to be 'splotched with red as if the snow-crust had cut the mules feet and dyed the snow with drops of blood'. 1933 E. Hawks Bh. of Air & Water Wonders vii. 145 Red snow was known to Pliny, and was attributed by him to a dust with which the snow became covered after it had lisin for some time on the ground. The phenomenon of red snow is due to the presence of some genus of slgm. scientifically known as Protococcus medii. 1973 Illiander (Victoria, B.C.) 17 June 5;2 The three explorers saw white ptarmigan, and the unique 'red snow' of the area.

2. transf. The alga which gives a red colouring to snow.

to snow.

1825 CARMICHAEL in App. Parry's Jrnl. 2nd Voy. 429 On ie whole, I should think...that you may safely arrange the

Red Snow among the Palmellar, 1845 DARWIN Floy, Nat. xx (1800) 345. On several patches of the snow I found the Protococcus nitralis, or red snow 1861 H. MACMILLAN Finith Page, Nature 145 Red snow has been discovered spreading over decayed leaves and mosses on the borders of

3. attrib., as red-snow shower, red-snow alga

3. attrib., as red-snow shower, red-snow alga or plant = sense 2.
1826 in Loudon Encycl Plants 928 The most remarkable red-snow shower was that which fell [inj] March 1823. in Tuscany. Ibd., The Lepraria Kermesina, which is considered only a particular state of the red-snow plant treeff. 1866 Chamber! Encycl. 3.v., The red snow plant consists, in its mature state, of brilliant globules like fine garners, seated on, but not immersed in, a gelatinous mass 1866 Septice Princ Psychol. (1872) I. III. in. 205 Of those classed with the vegetal kingdom, may be instanced the red snow alga. red snow alga.

red spider. A small red spider-like mite (Tetranychus or Acarus telarius) infesting plants, especially in hothouses. (See also quot. 1824.11646 Sir T. Browse Freud. Ep. 111 xxv. Table. Of the Tainct or small red Spider. 1793 Trans. Soc. Artisled. 21 V St. Destroying the Red Spider and other noxious insects. 1816 Kirry & Sp. Entomol. (1843) I. 101 The red-spider (Erythraus telarius) spinning its web over the under surface of the leaves draws out their juices with its rostrum. 1824 Loudon Encycl. Gardening (ed. 21 \$227.1 The red spider is the Acarus telarius, and the same name is also applied by gardeners to the scarlet acarus (A. holorenceus), the only the Dittish species of the genus which infest plants. 1871 H. MACMILLAN True Vine v. 232 In this country, the greatest when the vinery is the little red spider, whose movements over the leaves and fruit are exceedingly nimble. (Tetranychus or Acarus telarius) intesting plants.

red spot. 1. Astr. = great red spot s.v. GREAT a.

20. 1879 Monthly Notices R. Astron. Soc. XL. 86 The very remarkable red spot which has attracted the attention of every observer during the present opposition. 1902 Listener 20 July 130-1. After 1882 the Red Spot began to fade, and since then it has undergone various changes. 1977 Times Educ. Suppl. 21 Oct. 21 2 Neither is it true to say that with regard to the Red Spot on Jupiter, 'scientists do not know what cause it."

2. A defect of cheese in which there are fine red

spots throughout.

[1900 Bull. N.Y. Agric. Exper. Station No. 183 189 The evidence seems to be conclusive that the red spots are produced by the growth of a minute plant which finds its way into the curd before it is put to press.] 1932 Discovery Feb. 59 2 The trouble in cheese known as open-ness is being investigated and red spot in cheese and oiliness in butter have been studied with some success. 1955 J G Davis Dict. Dailying ed 21062 The peculiar fault known as red spot in Cheddar cheese is due to an organism biochemically resembling the mastitus streptococcus which apparently lives a saprophytic existence in the udders of certain cows.

red-spotted. a. Marked with red spots.

red-spotted, a. Marked with red spots.

1713 Petiver Aquat. Anim. Amb. 1 1 Cancer ruber. Red
spotted Crab. 1782 LATHAM Gen. Synopsis Birds 1. 11. 73b
Red spotted Creeper. Certhia cruentata (Linn.)... Its native
place is Bengal. 1802 SHAW Gen. Zool. III. 11. 49b Red
Spotted snake. Coluber Coccineus Black snake, with
yellow back spotted with red. 1883 Century Mag. Dec.
163.2 That beautiful inhabitant of fresh water, the redspotted trout.

redstart ('redstait). Ornith. [f. RED a. + START (ME. stert, OE. steort) tail: cf. RED-TAIL 1. Parallel forms are Du. roodstaartje, Flem. -steertje (†-steertken), Da. and Sw. rödstjert, G. rotsterz.

1. a. A small European and North African bird belonging to the genus *Phænicurus* of the family Turdidæ, esp. *P. phænicurus*, so named from its red tail, which it has a habit of moving quickly

from side to side.

from side to side.

1570 LEVINS Manip. 33,41 Redstarte. ruticilla. 1632
SHERWOOD, The Redstart, or Redtaile, rosignol de muraille, rubienne. 1657 Tomlinson Renou's Dip. To Rdr. c 2 Who can determine what becomes of Cranes. Cuckoes. Redstarts, that some are seen onely in Summer, some in Winter?

1678 PHILLIPS (ed. 4). Redster! (Rubicilla), a certain Bird so called from its red tail. 1774 G. White Selborne Ix. The song of the redstart is superior, though somewhat like that of the whitethrois. 1839 E. JESSE Jrnl. Naturalist 204 We have no bird more assiduous in attentions to their young than the red-start. 1840 Curver's Asim. Kingd. 190 The Whitefornted Redstart. is a common summer visitant in many parts of Britain. 1884 JEFFERIES in Chamb. Jrnl. 1 Mar. 131 A brightly coloured bird, the redstart, appears suddenly in spring. 1935 C. E. RAVEN In Praise of Birds vi. 76 Not far off was a Redstart's neat in a piece of old iron piping. 1956 J. Buxton Redstart xi. 132 Am I to describe as redstarts only those species which are placed in the genus Phoenicurus; 1973 T. Soper New Bird Table Bh. iii. 31 Redstarts and woodpeckers are hole-nesters.

b. black redstart, a related species, Ruticilla

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titys, occurring in southern England and common on the European continent.

1836 Eyron Rarer Brit. Brids 7 Black Redstart. Ficedula Tithys. This Redstart inhabits chiefly the warmer parts of Europe. 1844 Newton Diet. Brids 776 The males of the Black Redstart seem to be more than one year in acquiring their full olumage.

Black Redstart seem to be more than one year in acquir their full plumage.

C. attrib. with warbler (= prec. senses).

1817 Shaw Gen. Zool. X. 11. 670 Redstart Warble (Sylvina Phonicurus.) Ibid. 673 Grey Redstart Warble (Sylvina Gibraltarienss.)

An American fly-catching warbler, Setophaga ruticilla, outwardly resembling the